

[REDACTED]

From: J LUKKA [REDACTED]
Sent: 04 September 2018 13:54
Subject: Fw: Vale of Health

On Sunday, 19 March 2017, 21:10, Tony Covey [REDACTED] wrote:

Hi Jita

Really sorry but haven't yet – am trying to set a day aside this week to work on your things – but it won't be till Thursday or Friday as our daughter bought us a few days away at Hever Hotel in Kent for Christmas so we will be there for the next 3 days and therefore won't get to London either I'm afraid

I would contact Rob the squatter and just check his whereabouts and say we hope to have a draft declaration for him to review early next week – if he does email we could send it to him – I will transfer the notes from your map onto the survey plan so that we have an accurate picture of what was/is there – I will guess the location and size of the alleged missing caravan and when I do get to site to meet you we can measure it and plot it – I guess Health and Safety played a part – if you do complete and get access you could get some of the junk cleared that is hindering access to that caravan

Security – try these people – I have sent you this a couple of times now but perhaps it didn't come out – Live-In Guardians [REDACTED]

Kind Regards

Tony Covey ACABE

[REDACTED]

[REDACTED]

From: J LUKKA [REDACTED]
Sent: 27 March 2017 21:17
To: R. Jy
Cc: Alicia Logan
Subject: Fw: The South Fairground Site
Attachments: STATUTORY DECLARATION of Robert Andrew Litvoi.doc; The South Fairground Site London NW3 1AU Sheet 1 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 2 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 3 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 4 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 5 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 6 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 7 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 8 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 9 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 10 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 11 of 12.pdf; The South Fairground Site London NW3 1AU Sheet 12 of 12.pdf; ValeofHealth-Survey-170324-E-01-A3Dwg-nts.pdf

Hi Jita

Attached Statutory Declaration for Rob together with other documents which need to go to him for signature – If Alicia can read through it with Rob prior to travelling – ideally tomorrow then we can fine tune or revise as required
The drawings etc would be better printed onto A3 paper if possible but if not then I guess A4 will do

Kind Regards

Tony Covey ACABE

[REDACTED]

[REDACTED]

From: Tony Covey [REDACTED]
Sent: 28 March 2017 17:28
To: [REDACTED]
Cc: 'J LUKKA'
Subject: Roberts Statutory Declaration
Attachments: STATUTORY DECLARATION of Robert Andrew Litvoi.pdf

STATUTORY DECLARATION

I, **ROBERT ANDREW LITVOI**, [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 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 information I was unable to stay in contact 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 3 caravans and built a globe shaped structure between and in front of the caravans. 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. 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
16. I have seen a drawing of the site prepared by The Design Works dated March 2017 with the drawing number 170324/E/01 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

17. 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 and 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
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: **R A Litvoi**

Declared at:

The day of 2017

Before me:

A solicitor empowered by the law to take oaths.

Kind Regards

Tony Covey ACABE



[REDACTED]

From: J LUKKA [REDACTED]
Sent: 28 March 2017 20:38
To: Tony Covey
Subject: Re: Roberts Statutory Declaration

Tony please can you resend the amendments Alicia made so I can print it out and give it to her tomorrow. Are you able to take word squatter out of the photos I sent? Alicia liked the word compound? e.g compound entrance. Thanks

On Tuesday, 28 March 2017, 17:27, Tony Covey [REDACTED] wrote:

STATUTORY DECLARATION

I, ROBERT ANDREW LITVOI, [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 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 information I was unable to stay in contact 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 3 caravans and built a globe shaped structure between and in front of the caravans. 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. 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

16. I have seen a drawing of the site prepared by The Design Works dated March 2017 with the drawing number 170324/E/01 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

17. 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
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: R A Litvoi

Declared at:

The day of 2017

Before me:

A solicitor empowered by the law to take oaths.

Kind Regards

Tony Covey ACABE

