

CARDIFF COUNTY COURT  
CASE NO : BS 614 159  
Between:

MAURICE KIRK

and

CHIEF CONSTABLE OF SOUTH WALES POLICE

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WITNESS STATEMENT OF [REDACTED]  
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1. I, [REDACTED] retired, of [REDACTED] 9UY make this statement at the request of Maurice Kirk ("Mr Kirk") in support of his case. I am not a party to the proceedings
2. Between 1990 and 2004 I was proprietor of [REDACTED] Insurance Services, an Independent Insurance Intermediary.
3. At the end of 2004 I sold my business and therefore I do not have in my possession any paperwork relating to specific clients, the facts stated in this statement are therefore based on my own recollection of events.
4. Mr Kirk was a client of [REDACTED] Mr Kirk has sent me a copy of my memo to him dated 20th March 1997 and I confirm the writing on this document is mine.
5. Mr Kirk has also sent to me a document entitled "Statement of [REDACTED] relating to [REDACTED] and I can confirm that Mr Kirk did have a policy with [REDACTED]
6. Mr Kirk was a friend of my late father's and I know that when my father was an Insurance Broker in Taunton he also dealt with Mr Kirk's insurance. I worked for my father at weekends and during school holidays.
7. I recall on numerous occasions the police called and my father had to speak to them about matters relating to Mr Kirk's various cars or aeroplanes. This must have been in the late 1960s/ early 1970s.
8. I must admit I was surprised when some twenty years later, running my own business and dealing with Mr Kirk, I too received numerous telephone calls from the police requesting information about the vehicles that he owned and/or was insured to drive.
9. I also, on more than one occasion, recall Mr Kirk's insurance company contacting me to suggest that we replace his business at the next renewal. Although not explicit, there was suggestion that they were perturbed by the police contact they had obviously received.

I believe that the facts stated within this witness statement are true.

Signed:

Dated: