

Scottish Child Abuse Inquiry

Witness Statement of

PLD

Support person present: No

1. My name is PLD. My name at birth and whilst at school was PLD. My date of birth is 1959. My contact details are known to the Inquiry.

Life before care

2. I was born in Glasgow, at . I lived in Glasgow with my family. My dad was , and my mum was . Her maiden name was , which was my middle name.
3. I was in the middle of seven children, with three older and three younger siblings. From oldest to youngest, it was , , me, and . There was about two years age difference between us all.
4. My dad was an electrician and my mum was a housewife. We moved to Coventry in England because there weren't many jobs in Glasgow. I don't even know what age I was when we moved. My dad became a coal miner there.
5. We lived in a decent, clean house and had food. I don't know the full story, but my dad started drinking and womanising. He became a drunk and my mum would have to chase him for money.

6. My mum got unwell and I remember there were always doctors coming round to the house. My mum died of bronchial asthma when she was 34 years old. I believe she was pregnant at the time.
7. Relatives from Glasgow then came down to our house and chose what pieces of furniture they wanted and whichever pretty child they wanted.
8. I was skinny malinkey, my sister [REDACTED] was gawky with eyes looking in different directions, and [REDACTED] had a stutter. We were all given names by the family to match our traits.
9. Friends in Coventry took in [REDACTED], my oldest sister. She was one of those angelic looking, gentle young girls that everybody loved.
10. The children who were left, were sent to live with the mean relatives. I can't really remember what age I was but I don't remember starting school in Coventry so maybe I was about five years old when all this was happening.
11. I went to live with my mum's sister, [REDACTED], in Glasgow. Her husband was a drunk and I think she had her own problems so couldn't look after me. Then my brother, [REDACTED] and me were sent to live with my dad's mum who was an evil woman. She would lock us in the kitchen when she went out. It was so cold in there and she would take the plug from the heater so we couldn't use it. [REDACTED] tried to use the wires to put it on and ended up electrocuting himself.
12. My sister, [REDACTED] and me then went to stay with [REDACTED], my dad's sister. She was a cruel lady and only looked after us for the welfare money she got for us. We were bed wetters and she literally hung us up in wardrobes as a punishment.
13. [REDACTED] would force us out of the house, and we would walk the railway tracks looking for scraps of food. When there were football games on, she made us go out and ask the men if we could look after their cars and get pennies from them for it.

14. I think I started school while I was staying with [REDACTED], and I think it was called London Road School.
15. The welfare department got involved. I don't know if they realised we weren't being looked after or if [REDACTED] contacted them because she didn't want us anymore.
16. [REDACTED] and me were then taken on a ferry to Dunoon by the welfare people. [REDACTED] may have also been with us, but I only remember [REDACTED] going with me.

Children's Home – Dunoon

17. I was about eight years old and [REDACTED] would have been about six when we were taken to Dunoon.
18. We were first put into some Catholic place, but I don't remember the name. I think it was a Catholic charity run place. Secondary Institutions - to be published later

19. Secondary Institutions - to be published later

20. Secondary Institutions - to be published later

21. Secondary Institutions - to be published later

22. Secondary Institutions - to be published later

23. Secondary Institutions - to be published later

24.

25. I think it may have been a transitional place until they found us a place somewhere else. We were there for about three months before we were moved to Dunclutha Children's Home.

Dunclutha Children's Home, Dunoon

26. I was eight years old and [REDACTED] was about six when we were taken to Dunclutha. I don't remember our first day there or who took us. I just remember the place being massive compared to the place we had been in.

27. Everybody seemed ok in there and people were curious about us. It was a home for girls and boys, but I can't remember how many there were. I remember a lot of young girls there.

28. It was a regimented place with a lot of rules and order, but a facility like that would have to have order to be able to run properly.

29. It was a two storey building. The boys' dorms were upstairs in the building and the girls' were downstairs. The showers were downstairs.

30. The place was less dismal [REDACTED] Secondary Institutions - . It had big bay windows and the dorms had names on the doors. It seemed like a warmer environment.

31. We slept in the dormitories in age groups. The youngest girls slept in "Snowdrop" dorm, then there was "Rose" and "Daffodil." I probably started off in the Rose dorm. There were rows of beds, I think ten on each side of the room, so about twenty in the dorm. The girls were all a similar age to me. There was no privacy.

32. The boys had two dorms upstairs, which were smaller than the girls. We would never go up there, unless we were dropping off laundry or something when we were older. The separation between boys and girls was quite strict
33. There was a long hallway that had hutches coming off it, which looked like they had been added on years later. There was a big dining room and play room. Behind that, there was a baby and child place, where babies from three months old stayed, until they were maybe about four years old. Then they were moved to what was called "the big house," which was the main building.
34. There was a conservatory where plants were grown. There was a wooded area outside the home. Further up the hill, there was a farm where you could buy vegetables.

Staff

35. RCN [REDACTED] was SNR [REDACTED] of the place. FFX [REDACTED] was the house master and [REDACTED]. I don't know if that was his official title though.
36. Other staff in the place were called nurses, and I believe they wore nurses uniforms. I remember Nurse FGH [REDACTED], which I thought was her actual name, but it might have been Nurse FGH [REDACTED] or something and the kids made up that name for her. There was also a Nurse Ratchet and Nurse RCS [REDACTED].
37. Some of the nurses were the same age as the older girls in the home, and the nurses who were older, were just miserable.
38. Mr and Mrs FGG-SPO [REDACTED] came along after I had been there for a few years. I think they took over when RCN [REDACTED] retired. Mr FGG [REDACTED] was like a house father or house master type person, although I don't know if that was what they called themselves. FGG-SPO [REDACTED] had their own kids and their living quarters so that the kids didn't mingle with the rest of the kids in the home.

Routine at Dunclutha

39. We would get woken up at probably 5.30 or 6 am, then got washed and dressed for school. You would shower if you were a bed wetter, which I was.
40. After dressing, we made our beds and went to the dining room for breakfast. We then walked to school. We had our school day and lunch at school, and walked back to the home after school.
41. I believe bed time was 8 pm. Everybody was in the dorm and lights were out by then. We would be laughing and giggling at night after lights out, and playing games like truth and dares.
42. There were two night time nurses on duty through the night so the girls would take turns having lookout to see if the nurse was coming because you weren't allowed to talk after lights out.
43. I don't know if it was a later bed time as you got older, but it wouldn't have been that late as we had early starts. Also, when it was cold in the winter time, being warm in bed was the best place to be so you didn't mind.

Mealtimes / Food

44. Everybody ate in the dining room together. The dining tables were round. There was no talking and people just tried to get the eating over with.
45. The food was slop. There was runny or lumpy porridge for breakfast. I also remember a lot of tea and toast. We had lunch at school, which wasn't much better.

46. Tea time in the home might have been better, but I don't have any good memories of the food. I remember there was tapioca.
47. I think you had to finish what was on your plate, and either sit there until you finished it, or you would get it at your next meal, but I don't really remember. I just remember being force fed.
48. I was a bad eater, and struggled with the food. I would try to stuff food in my pockets and into my shoes. FFX [REDACTED] caught me doing this a few times, and when he did, he made me an example. He would grab me by the hair and force feed me. If I spat it out, he would stuff cod liver oil down my throat as a punishment, and close my mouth so I would have to swallow it. He did this in front of everybody in the dining room.
49. I don't remember what age the force feeding started at. Maybe it was as young as eight years old but I can't be sure. I remember it happening when I was a bit older. It became a thing with him and me. He would make a point to punish me to prove to everyone that we had to eat what we were given.
50. If you didn't eat your food, then you didn't eat until your next meal. Me and my friend used to steal food at night. The girls would have dares to distract the staff while someone else would go and steal food.
51. RCN [REDACTED] had a sweet shop that we got sweets from. I can't remember if we got pocket money to get them, or how it worked.

Washing / bathing

52. I think we showered at weekends. You were made to shower in the morning, even during the week, if you were a bed wetter, which I was.
53. I think there were maybe six showers and possibly a curtain between them. I don't recall any more. There was no privacy. The female staff, who monitored shower

time, could come and pull the curtain back at any time. You also had to dry off all together outside the showers.

54. I hated being naked in front of people. I was a skinny, anaemic looking kid and with the changes happening to my body as a young girl, I just found it humiliating. Even though I knew I was different, I was reminded that I was different by the staff who would make horrible comments about my body.

Clothing / uniform

55. We were given clothes to wear in the home when we needed them. We wore uniforms to school.
56. As we got older and made our own money from jobs, we could buy our own clothes and things we wanted.

School

57. We went to Kirn School, and wore a uniform. We walked to and from school, which was about a mile away from the home. The staff didn't walk with us, but the older kids probably looked after the younger ones. We were like a band of kids and protected each other.
58. I would see my brother [REDACTED] on the way to and at School, while he was still at Dunclutha.
59. I believe I was a bit of a dunce kid at school. I wasn't the brightest, and I got battered a lot because I struggled with the work. I still enjoyed school because it was away from the home. You were the same as everybody else because of the uniforms.
60. The high school I went to was Dunoon Grammar School. I did cross country running when I was there, which was another means of escape from the home.

61. I left school with no qualifications just before I was sixteen.

Leisure time and weekends

62. The play room in the home was like a gym room used for doing gymnastics, which FFX liked doing with the kids. There was a climbing horse and things like that in there.

63. In our free time, we could play outside in the wooded area. We would play football and swing from trees. I would see [REDACTED] when we were outside.

64. I was a bit of a tom boy and liked hanging out with the boys. [REDACTED], [REDACTED] and [REDACTED] were the boys who I hung out with. They were my three mates. The proper names of two of them were [REDACTED] and [REDACTED]. I think. They were a similar age to me, maybe a year or two older.

65. I was accepted as one of the boys. I self-taught myself to fight. I felt that people would not bother me if I could look after myself.

66. I don't remember being made to do chores or anything at the weekends. We were made to go to church every Sunday.

67. As we got older, about fourteen years old, we went out and got jobs at the local shops and hotels. We were kind of forced to do it, to buy our own things, but I think that was the norm for most people back then. It was an expectation to work if you wanted money.

68. I got a job at a shop called [REDACTED] when I was about fourteen years old. It was a place that rented rowing boats and deck chairs to people on the beach, and also an ice cream and sweet shop. It was run by a dirty old man called zPQZ or zPQZ or something. He had been there for years with kids from the home working for him.

69. I didn't work there long because the owner tried to make a grab for me. I then went to work at a hotel to wash dishes and do housekeeping, and that sort of thing.

Religious instruction

70. We were made to go to church on a Sunday. It was a Church of Scotland Church which was a fifteen minute walk from the home. The staff didn't come in with us, and I don't remember if they walked us there and just stood outside and smoked.
71. I didn't like going. It was just all old people screeching away. Me and the other kids would steal money out of the donation box when it got passed round to go and buy Kojak lollipops. We were just young and stupid.

Trips / Holidays

72. I remember about fifteen of us being taken on a boat somewhere, which may have been to Iona. We stayed there for about two weeks. I think it was a place to refresh and get well if you were sickly. There were other kids there from other places too.
73. I don't remember any other trips or holidays in the nine years I was there.

Birthdays and Christmas

74. After the American navy ships came into Dunoon, Christmases got better. The Americans got involved in charity services and tried to do good things for the community. They were young men who probably missed their families as well. They would bring toys for the kids in the home and made Christmas quite colourful. That was a big deal for us.
75. We made Christmas decorations for the home and had a tree. We got a Christmas dinner too.

76. Prior to the Americans coming, we got an apple and orange at Christmas. We should have got that at any time, and not just as a treat at Christmas.

77. I don't remember anything about a birthday, ever. They weren't celebrated.

Visits and family contact

78. [REDACTED] would take the blame for lots of things. He was angry and hated the world, so would take the world on. He was a bad boy because he was a bit rebellious, but he was a good boy because he was loyal, loving and protective. He was sent to Gryffe Children's Home when I was about thirteen or fourteen years old, and he would have been about eleven or twelve. We were separated then.

79. My sister, [REDACTED], was the oldest of us, and lived in Glasgow. She visited as often as she could, which was once every six months.

80. Nobody else visited me. I don't remember any social worker or any other outside person coming to ask how I was.

81. When we got older, about fourteen years old, you got a pass to go stay with family. I would go and stay with [REDACTED] in Glasgow for the weekend.

82. I went to visit [REDACTED] in Gryffe Children's Home when I was visiting [REDACTED] one time. He was battered and bruised and really sad.

83. [REDACTED] also took me to visit our youngest brother, [REDACTED], who lived with a relative. We would stand in the hallway and speak to him for five minutes. He was never allowed to go out with us.

Healthcare

84. I don't know why the staff were referred to as nurses, because they weren't nurses even though they wore nurses uniforms with pinafores. I don't think they had the necessary training to be called nurses, or to even know when a kid was sick.
85. I got seriously sick when I was about twelve years old, and told the staff that I had pains in my stomach. They didn't believe me and thought I was trying to get off with going to school and they wouldn't let me stay off, and made me walk to school.
86. I made it to school and was in a lot of pain. I went to see the nurse and collapsed when I got there. I was taken to Dunoon Hospital and it turned out my appendix had ruptured.
87. My appendix was removed and I had to get the poison drained from my stomach. I still have the scar to prove it. I stayed in Dunoon Hospital for a few weeks, with tubes in me. I remember kids from the home coming to visit me.
88. I think the staff in the home were unqualified to give medical care and were just ignorant. It also depended on whether they could be bothered with the kids or chose to believe them.
89. We would sometimes be taken to a doctor, which I never liked because it was a male doctor and I hated being around men. I don't know where that came from, or when it started. Maybe I was interfered with by my dad when I was little, but I don't know.
90. When the doctor told me to take my top off, I would be embarrassed and would turn his room upside down, but wouldn't let him near me. I think his name was Dr John Smith, but I am not sure. I don't think he was unkind, it was just that I felt violated when it came to my clothes and taking them off, and I would fight anybody.
91. Kids were taken to a dentist in Dunoon when they needed dental treatment. A group of about five or six of us would be taken together.

92. I remember the dentist just yanking my teeth out with pliers. I don't think I even got numbed before it. It was horrific. I don't remember having rotten teeth that would have required my teeth being pulled out. Maybe I needed some treatment, but I think it was just more convenient for them to pull our teeth out instead of giving us treatment. I would hear other children crying and screaming when they were in there as they had their teeth pulled out too, and crying when they came out.
93. I used to get toothache and ear ache so bad after that, that my face would be swollen and I would bang my head against walls with the pain. I continued to have toothache and ear ache into adulthood, until it was discovered that the dentist in Dunoon had pulled my teeth out but left the roots in, which continued to get infected throughout my adult life.

Running away

94. I ran away four or five times. That started when I was about thirteen years old or so, usually by myself. I just wanted to get away from the place.
95. Other kids ran away as well. We would tie sheets together and hang them out of the window and climb out at night. I wouldn't get very far and would always be brought back by the police.
96. One time I ran away with other kids and we got on a boat, and ended up in Millport. The police were there when we docked. All the kids told on me and said I was the leader.
97. Whenever I was brought back to the home after running away, I would be beaten up by whatever staff was on. Mr FGG was there by this time and he was pretty strict. He would hit me, and so would FFX

Abuse at Dunclutha

98. Children who were seen as behaving out of line were seen as a problem. We got the belt from the staff for stupid things like not making your bed properly, or not coming in from outside quickly enough when the whistle blew. I think it was more of a power thing for them, like they had something to prove, that they were in charge and not the kids.
99. I remember crossing my hands to get the belt and the staff would try to not hit your wrists. They would sometimes put books on your wrists to protect them.
100. It was normal to just get slapped over the head by staff as you were walking along. I got force fed by FFX [REDACTED], who I think had a real dislike for me. I think he saw me as defiant. He'd force cod liver oil down my throat and shut my mouth so I had to swallow it.
101. FFX [REDACTED] and Mr FGG [REDACTED] would beat me up when I was brought back after running away. I was punched in the stomach a few times, punched on the side of the head, and they liked to grab my hair.
102. You could smell the fear when FGG [REDACTED] and FFX [REDACTED] came near you to hit you. Whenever I felt the fear of them coming near, I learned to run. All the kids did the same. If a kid was being battered, the rest would just scatter and run so they wouldn't be next.
103. I think Mr FGG [REDACTED] had worked in a prison or borstal or something before because he was so regimental. He handled the kids with fear and intimidation. Mrs [REDACTED] tried to negotiate things a bit more than him. Their own kids lived in the home too, and if we taunted them, which we sometimes did, then Mr FGG [REDACTED] gave you a beating for it. Some days the beatings were worth it though.
104. I am sure I was hell on wheels sometimes and might have deserved being hit, but the staff let their anger get the better of them and took it too far. I always wondered why they didn't just let me run away.

105. I remember Nurse FGH and Nurse RCS hitting the kids. They hit me. Not all the staff were physically abusive. RCN was stern but never cruel. The majority of the staff were mentally and emotionally abusive. The nurses were verbally abusive during shower times. They would taunt me and comment on my body that I had nothing growing, and that I had a skinny butt. There was a lack of compassion and empathy.
106. You could see that some of the nurses just went along with the staff who were being horrible. They maybe did this not to be ostracised, but afterwards, when they were not with the other staff, they would slip you an apple and be nice. You could tell that they didn't want to be bad, but wanted to be part of their peer group.

Bed Wetting

107. I was wetting the bed in there. I think it was nerves that made me do it. I was humiliated for it. There was no discretion.
108. The nurse would come into the dorm in the morning, put the lights on and would instantly shout at everyone to get up and pull their covers back to show her the sheets, to see if anybody had wet the bed. If I had wet the bed, I was made to strip it in front of everyone. Then my face would be stuck in it and I would be made to walk down the hall with my sheets whilst being shouted at. This was common practise for some nurses but not every nurse did this.
109. During shower time in the morning, some staff would continue to say things like, "PLD wash your pishy self, off." It was humiliating.
110. I used to try and get up before the other kids in the morning, and get in the shower, so that other kids wouldn't see that I had wet the bed, and also to shower alone.
111. You never told anybody what was happening in the home because it was just a normal way of life for us. There was nobody to tell anyway. You wouldn't tell teachers at school, because they were just as bad at giving the belt for little things.

Sexual abuse

112. I worked part time in [REDACTED] when I was fourteen years old. Other girls from the home had been working there for years. I would hear girls from the home saying that the owner, who was called [REDACTED] or [REDACTED] would fondle them sexually. He would give them treats as well because he was sneaky.
113. I think he targeted girls who he thought were vulnerable. I was quiet natured, and small so he must have thought I was vulnerable. He made a grab for me one time, when I worked there, trying to touch my breasts but that was the last time because I left that job straight away.
114. I don't know if the staff in the home knew what he was doing to the girls, but they must have because the girls spoke about it all the time and would get treats. I think the staff just looked the other way and ignored it, which is what people did back then.

Leaving Dunclutha

115. I was sixteen years old when I left Dunclutha. I had finished school and that was the age that everyone left. I was just told I was leaving, but I don't remember who by or how it was done.
116. I think you just knew you were leaving at sixteen because you had seen all the other kids leaving at that age. You finished school at sixteen and back then were considered as having grown up, and were just aged out of the home. You also wanted to leave and have the opportunity to get away.
117. Nobody set you up for leaving or gave you advice before you left. It was up to you to work out what to do and you relied on people you knew and part time jobs you

already had. I was already working in a hotel and so knew I could stay in the hotel and get room and board, which is what other workers did.

Life after being in care

118. I worked in a hotel in Dunoon and got room and board.
119. I went to Glasgow for a bit and stayed with my sister, [REDACTED]. I worked in a factory there, in their office, which was quite posh compared to my sister who worked in the factory itself. That didn't work out and I absolutely hated it there so I went back to Dunoon and worked in hotels again.
120. I worked in a few hotels in Dunoon which gave room and board. There would be a couple of people in the room, and the hotel would just take payment from your wages. I did housekeeping jobs and then also did reception work.
121. I met my husband when I was about nineteen years old. I was working in a tea room and I would serve him. He was a big, handsome American sailor in a white uniform and he would always try and talk to me. Then one day he came in with flowers and we started dating. It was a comfortable dating experience because he was a gentleman.
122. We got married when I was nineteen years old and I moved to America with him when I was about twenty years old. We lived in New York for a short time, then in Guam for a couple of years. I worked in the reception of a children's day care centre. I also drove for the military, collecting money for them. Then we moved to Puerto Rico.
123. We had two kids together and then a few years later, when we were 28 years old, I found out my husband was gay and that destroyed my world. We separated then, when our kids were eight and twelve years old, and they stayed with me. Once again I felt like a man had let me down. I have been on my own since.

124. Looking back, I married my husband and I liked that he was gentlemanly and didn't pressure me for sex. It was a safe environment for both of us.
125. I moved to Florida twenty years ago. This is the longest I have stayed anywhere. I have been in the same job for eighteen years. I am now managing director of a company that finds daily contract jobs for workers with construction companies. Most of the workers come from facilities so we find jobs for people with no qualifications, and who need work. We help them get the certifications, clothing and equipment that they need, and also organise transportation to and from the job sites.
126. My son and daughter are both in the military. My son is a bomb technician who has one medals, and my daughter works on the flight line, instructing people how to load the bombs onto planes correctly. They are really involved within the military and travelled extensively well within their roles. They have both done really well and excelled at their careers.
127. I have had a relationship with my sisters [REDACTED] and [REDACTED] over the years, as much as I can, living so far away. [REDACTED] has dementia now.
128. I don't have a relationship with the rest of my siblings. [REDACTED] was in care but I don't even know where. He was a cruel, bad soul, from what I know of him. [REDACTED] tried to reach out to me and we have spoken a few times but I have no emotional connection to him as I haven't seen him since he was about six years old.
129. Our sister, [REDACTED], lived with our mum's sister and we thought she had everything and had it the best. Unfortunately, she has gotten involved in a life of drugs. [REDACTED] died when he was 29 years old from a drugs overdose.
130. I saw my dad a few times after leaving care when I was still in Scotland. He met my husband. My dad was an alcoholic and died when I was in my twenties.
131. I have never reported anything that happened to me in care to the police.

Impact

132. I wasn't slow as a kid, but I was never properly guided at school or in the home. I wasn't given the same opportunities as other kids, and so I didn't do well at school or get any academic qualifications. Despite that, I have done well for myself after leaving care but that is because I had the drive and the will to do well.
133. I always had trouble with my teeth after visiting the dentist in Dunoon when I was in Dunclutha. I would have really bad toothache and ear ache all the time but I had the fear of visiting dentists because of what the dentist in Dunoon had done to me. This carried on for a long time, until I got proper dental care in America and they discovered that the dentist in Dunoon had pulled teeth out but left the roots in. I had to have the roots surgically removed.
134. To this day I have problems with eating because of the force feeding at Dunclutha. This carried on even after I had a baby, and the doctors thought I was anorexic.
135. I can come across as cold and as having no emotions. That is what people think of me, and I am a loner. I can count my friends on one hand. I am terrible at relationships. Not because I am a bad person, but I am socially awkward and self-conscious. I much prefer dogs to people. What I went through as a kid has made me that way.
136. I have not been in a stable relationship since I found out my husband was gay and separated from him when I was 28 years old. I struggled to trust anybody anyway and then that happened. I find it hard to trust people, and that is because of what happened with him and also from my time in care. I am very selective now with people. I am quick to say goodbye and I shut down when things get too intimate and close.

137. Me and my siblings were all separated from each other and so had no chance of being a family. We didn't all have a strong bond as adults, because we were so broken by the system. I didn't even know where some of them were when I was growing up.
138. I was quite close to a couple of my sisters growing up, but I didn't even talk to them about being in care. I never talked to anyone about it because you feel shame and embarrassment. People can't relate to it unless they've lived it so I lock it away and don't talk about it. I haven't had counselling or anything either.
139. I swore I would never treat my kids the way I was treated in care. I wasn't very affectionate towards my kids and don't cuddle and kiss them, and show love that way, because I never had that. I was very protective of them and would fight anybody for them, and that was the way I showed love.
140. There are two ways to look at what being in care did to me. There are the things that it did to me but also what it did for me. It has made me strong to the point that I can face anything.
141. I don't feel like I belong in Scotland or America. I feel like I am in no man's land. I would love to be able to go back to Scotland and feel like I am from there and have my existence validated.

Records

142. The only thing I knew about myself was my national insurance number. I went to get my records from somewhere in George Square in Glasgow, a couple of years ago but I didn't get anything. I would like to know where I was and when, and why I was put where I was. I would like answers.

Lessons to be Learned

- 143. Families need to be kept together, even if they are a big family. That is the only way they stand a chance of being able to be a family.
- 144. Staff need to learn to talk about things with kids and ask what they want and how they feel.
- 145. Not everything about being in care was bad. There were good times with other kids, but bad people had been put in positions of power.
- 146. I have no objection to my witness statement being published as part of the evidence to the Inquiry. I believe the facts stated in this witness statement are true.

Signed..... PLD

Dated..... *6/21/2021*