

**EAST SUSSEX COUNTY COUNCIL
STATEMENT OF WITNESS**

(C.J. Act 1967, s.9; M.C. Act 1980 ss5A(3)(a) and 5B, Criminal Procedure Rules 2012, Rule 27.2)

Name: Mandy Covey
Age of Witness (if over 18 enter "over 18"): Over 18
Occupation: Medical Secretary

This statement (consisting of pages 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.

Signed.....Signature witnessed By.....

Dated the 18 day of May 2022

I am the above named person and I am a Medical Secretary for Neuro Sciences based at Hurstwood Park Hospital in Haywards Heath. I have held this role for approximately 20 years. My role involves typing medical letters and answering the phone to patients.

On the 12th of May 2022 I was contacted by Mark Jobling who is the Investigations Officer for the Blue Badge Team at East Sussex County Council. I was informed that he was carrying out a criminal investigation regarding a Mr Riccardo Gresta who had previously been a patient under neurology at Hurstwood Park Hospital. The investigation related to a letter that Mr Gresta had provided to the Blue Badge Team as evidence in his appeal against the renewal of his blue badge which was refused.

At 1015hrs on the 18th of May 2022 I met with Mark Jobling, the Investigations Officer for the Blue Badge Team at East Sussex County Council. The purpose of the meeting was that I was informed that Mark was conducting a Criminal Investigation relating to a Blue Badge Client who had provided a medical letter in support of his Blue Badge appeal after being assessed as not being eligible for a Blue Badge. It was suspected that the letter that had been provided was not genuine. The letter was regarding a patient by the name of Mr Riccardo Gresta, DOB – 28/03/1977 residing at Flat 1 Elms Avenue, Eastbourne who had previously attended Hurstwood Park Hospital for an appointment with Neurology under Dr Angus Nisbet. The letter was dated the 19th of April 2022 and related to an assessment at Neurology for Mr Gresta.

Upon viewing this letter I immediately drew the conclusion that it was not genuine. There appeared to be errors in the grammar and not consistent with a letter typed by a medical secretary. Within the letter under the heading of On Examination it states Mr R Gresta is not able to walk more than 15/20 meters in once, and he is in high level pain and risk to loss balance to increase or repeat walking effort. Other symptoms are hugely variable and unpredictable. This immediately stood out as not being genuine and also hugely spelt incorrectly. Under the header Opinion and management within the letter it states there is evidence the health conditions are cause by organic I degenerative spine disease. Again there are grammar errors with cause instead of caused. Under the same header it states currently there is any treatment as opposed to currently there is no treatment. Under the header of Conclusion within the letter it states to avoid further stress to Mr Gresta there is any need for further follow up. This again is not consistent in grammar and not correctly worded due to it not clarifying if there is any need for a follow up or not. And most noticeably it was signed of at the end of the letter by a Angus Anderson – Independent Consultant Neurologist. I can confirm that there is no consultant by such name at Neurology at Hurstwood Park Hospital. However we do have a Independent Neurology Consultant called Dr Angus Nisbet. The letter appeared to be on headed paper with the details showing it was

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Continuation of statement by MADY COVEY

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paper with the details showing it was from Brighton and Sussex University Hospitals and under the header and details of Hurstwood Park Hospital

At this point I checked the electronic records for Mr Gresta in order to conclude if this letter presented to me was in fact on his records. Upon checking I could find no record of any such letter. I could also see from the records that Mr Gresta last attended Neurology in September 2019 due to Mr Gresta being referred to Neurology by Sussex Musculoskeletal (MSK) - Mr Michael Anderson. Following that appointment with Dr Nisbit in neurology in September 2019 a transcribed medical letter was produced and sent to Mr Anderson (MSK) and copied to both Mr Gresta himself and Mr Gresta's GP - Dr Pravin Jain at, The Surgery, in Bolton Road, Eastbourne. I can produce this letter as my exhibit - (MC/01)

Having viewed this letter from 2019 I can conclude that there are similarities within the letter compared to the letter Mr Gresta provided to the Blue Badge Team as supporting evidence to support his appeal. Within the letter provided by Mr Gresta dated 19/04/2022 under the heading of On Examination it states - There was a lot of functional overlay and functional weakness which was present on pretty well all movements of the legs and distraction showed this to be variable. The exact wording appears under the same heading in the 2019 letter. Again with the letter provided by Mr Gresta to the Blue Badge Team at the end of the letter it states - To avoid further stress to Mr Gresta there is any need for follow up. Within the letter dated 2019 from Neurology at the end of the letter it states that - I have not arranged any follow up for the time being. The grammar in the letter is therefore not consistent with any letter from a Consultant

I believe that the letter I was shown is in fact not genuine but a letter created by someone other than any medical profession. I also note that the letter has been signed of as Angus Anderson which is the first name of Dr Angus Nisbet and the surname of Mr Michael Anderson. I again confirm that there is no consultant registered under the name of Angus Anderson.

I am willing to attend Court to give evidence if required.

Signed: Mady Covey
Signature witnessed by: