

[REDACTED]

From: FOI
Sent: 14 May 2021 09:53
To: [REDACTED]
Subject: FOI 019-21 - Response
Attachments: FOI 019-21 - (appended 21-01-2021) Letter to the Electoral Commission - 21 January 2021_Redacted.pdf; FOI 019-21 - (appended to email 02-02-2021) Letter to the Electoral Commission (Chief Executive) 2 February 2021_Redacted.pdf; FOI 019-21 - Emails to release_Redacted - All.pdf; FOI 019-21 - (appended 07-01-2021) Letter to the Electoral Commission 7 January 2021_Redacted.pdf; FOI 019-21 - (appended 18-01-2021) Letter to the Electoral Commission - 18 January 2021_Redacted.pdf

Dear [REDACTED],

Our Ref: FOI-019-21

Thank you for your email to the Electoral Commission dated 25 February 2021.

The Commission aims to respond to requests for information promptly and regrets that it has not done so within the statutory timeframe of twenty working days.

Your request is shown below followed by our response.

Any correspondence (email, letters, telephone transcripts etc) regarding the change of name of the Brexit Express (BE) party to the Reclaim Party? From the date of the initial application to the decision being published.

On 16 April 2021 we requested clarification of your request. Your response, received the same day, was, in part, as follows:

I'm prepared to drop the telephone transcript part of my request and concentrate purely on written correspondence either in the form of letters or email. I'm not particularly interested in the submissions from the public as I know the majority of these will relate to the Reclaim Project Charity and their supporters. The element I am most interested in is the internal decision making process and how the approval was arrived at, why the long delay and what legal action/representation the Brexit Express/Reclaim party presented.

I'm particularly interested in how a party with no funds at the start of 2020. Who received no donations in excess of £7500 in Q1/Q2 of 2020. Who apparently were even unable to secure a bank account were able to mount any sort of legal action. In an Article for "The Critic" (<https://thecritic.co.uk/issues/april-2021/banking-party-poopers/>) Jeremy Hosking says "Over the past two years BEBE was turned down by Svenska Handelsbanken, Arbuthnot Banking (bankers to the Brexit Party), Starling Bank and HSBC, and Reclaim has encountered the same problem." He also says "You might have thought this would be a simple process, but the Electoral Commission put every obstacle in our way, giving lengthy and unjustified credence to a complaint by a small Manchester-based charity called the Reclaim Project that the two organisations might be confused."

Based on your initial request and your clarification response we understand your request to be for:

Correspondence relating to the change of name of the Brexit Express (BE) party to the Reclaim Party regarding the Commission's internal decision making process and how the approval was arrived at, why the long delay and what legal action/representation the Brexit Express/Reclaim party presented. Your request excludes correspondence from members of the public commenting on the party's application.

Our response is as follows:

We hold the information you have requested. We have released some of the information we hold (see attached), and some of it has been withheld or redacted because it is exempt from disclosure as explained below.

Section 40(2) of the Freedom of Information Act 2000 (FOI Act)

You will notice that certain personal details have been redacted from the documents we are releasing. Section 40(2) provides for an exemption where the information requested constitutes personal data as defined by the Data Protection Act 2018 (DPA), and where release of the information requested would breach one of the data protection principles under the UK GDPR.

Some of the information falls within the description of personal data as defined by the DPA because the information relates directly to an identifiable living individual. This includes names and contact details of individuals in some instances. The individuals in some cases are junior staff members and they would not reasonably expect their information to be released.

Section 42 of the FOI Act

Some of the information you have requested includes legal advice. For the reasons set out below, the Commission considers that legal advice is exempt from disclosure under section 42 of the FOI Act, and we are withholding this information from release. Section 42(1) provides for exemption from disclosure information that is privileged under legal professional privilege. The requested information being withheld from disclosure under section 42 constitutes legal advice relating to this matter; it is legally privileged communications and advice provided by legal advisors. Application of this exemption is subject to the public interest test.

The general public interest inherent in this exemption will always be strong due to the importance of the principle behind legal professional privilege. Further, in this instance, the fact that the advice is recent provides additional weight in favour of withholding the information. Some clear, compelling and specific justification for disclosure must be shown, so as to outweigh the obvious interest in protecting such information. There is no such justification applicable here. So the public interest lies in maintaining the exemption.

Having carefully weighed the public interest relating to possible disclosure of the information requested under s 42(1), we are satisfied that it is not appropriate at this time to disclose the information that the Commission holds. The Commission is satisfied that maintaining the exemption outweighs the public interest in disclosure.

Not within the scope of your request

Some information has been redacted as it does not fall within the scope of your request.

The Commission strives to be an open, transparent authority and I trust that this information satisfies your request, but in some circumstances we cannot responsibly release requested information, and we ask for your understanding in this regard.

If you are not satisfied with this response, please note that the Commission operates a review procedure, details of which can be found on the Commission website at:

<https://www.electoralcommission.org.uk/freedom-information/make-a-freedom-information-request>.

Please also note that if you have exhausted all internal Commission review procedures and you are still not satisfied you have the right to appeal to the Information Commissioner. Details of this procedure can be found on the ICO website: <https://ico.org.uk/>.

Yours sincerely

Information Officer

FOI@electoralcommission.org.uk

The Electoral Commission

electoralcommission.org.uk

to: Partyreg@electoralcommission.org.uk

Date 7 January 2021

Your ref

Our ref [REDACTED]/054220.0002

Direct Dial

Direct Fax

Email

██████████ – Registration
Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Dear Sirs

Brexit Express (BE)/ the Reclaim Party

We act for the Reclaim Party (formerly Brexit Express (BE)).

Our letter concerns the delay in the Commission's decision on whether or not to grant our client's application to amend its registered name.

Our client's application to change its name

Pursuant to the Political Parties & Referendums Act 2000 ("the PPRA"), our client was registered as a political party with the Electoral Commission ("the Commission") on 13 March 2019.

Its leader is Mr Laurence Fox, its Nominating Officer is Mr Stephen Hazell-Smith and its Treasurer is Mr David Bailey.

Our client intends to field candidates in the forthcoming local elections to be held in England on 6 May 2021.

On 14 October 2020 our client applied to the Commission under s30 of the PPRA for a change of registered name from Brexit Express (BE) to Reclaim. It also applied to change the name of its Leader from Mr Jeremy Hosking to Mr Laurence Fox.

The Commission acknowledged receipt of that application on 15 October and confirmed that it had processed the change of Leader's details and that the application for the name change would be considered by the Commission. Further correspondence followed and our client dealt with such matters as the provision of a revised financial scheme and confirmation that it had not received further donations.

In October, our client received a complaint from an organisation claiming that it had rights to the name "Reclaim" (albeit the organisation in question was a charity and not a registered political party or registered campaigner). Whilst our client did not accept that there was any legal merit in the complaint, in the interests of conflict resolution it decided to refine its new name to "The Reclaim Party". As a result, Mr Bailey of our client emailed the Commission on 29 October to indicate that our client wished to make this change. He enquired whether this could be done via an amendment to the existing application or whether a fresh application was needed.

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██████ of the Commission helpfully responded the same day and confirmed that an amendment was fine but that all authorised officers of the party needed to confirm it.

There was then a period of correspondence between the parties in relation to the obtaining of the relevant authorisations and their notification to the Commission. After further emails, our client submitted the required authorisations on 13 November. It did not receive an acknowledgment at the time and chased up for confirmation that its amended application had been accepted. On 24 November, the Commission confirmed that our client's amendment had indeed been received and was being assessed.

Thus, since at least 14 October 2020 the Commission has been aware of our client's wish to change its registered name to incorporate the word "Reclaim". (Indeed, we note also that on 15 October, the Commission had published a notice on its own website stating that our client was seeking to change its name to "The Reclaim Party" rather than to just "Reclaim" (see attached screen shot)). Since at least 13 November – more than 7 weeks ago, the Commission has had all the information it had asked for so as to be able to determine and process the amended application for the change of name.

Yet it is now 7 January 2021 and no decision has yet been made.

Mr Bailey of our client sent further emails to the Commission on 15 and 21 December chasing up on the application and stressing the importance of it being processed without delay.

On 23 December, Mr Bailey received a response to these chasers from ██████ of the Commission which stated, inter alia, as follows:

"My apologies for the delay in responding to you. Firstly, I would like to reassure you that we are actively working on your assessment. We plan to take a decision in January and we will provide further updates once the date for a decision becomes clearer.

*As you are likely aware **there are a number of entities, some registered political parties, which engage in political discourse in the UK and have names similar to that applied for by Brexit Express (BE). We have thus needed to work through a number of considerations in order to take a decision.***

*Where the application details changed after the initial submission, the six week assessment period was reset where our process was required to start again. Six weeks from this amendment would have been the end of this year. I recognise that our work on this application will take longer than six weeks, and that of course you are seeking a decision as quickly as possible. As mentioned above, the decision will not be this side of the New Year. We always have to balance assessing a number of applications at once, and while six weeks is our aim, **as a public body we must take a reasonable decision and that can take shorter or longer depending on the facts.**" [emphasis added]*

Thus the Commission's position as of 23 December was that there were a "number of entities" with similar names and that the normal six week period for dealing with applications could take longer "depending on the facts".

The law: a change of name

Section 30(1(a) of PPRA states as follows:

*"A party may apply to the Commission to have its entry in the register altered by—
(a) changing its registered name,"*

Section 30(2) states:

"Subject to subsections (3) to (6A), the Commission shall grant an application under this section."

In other words, the statutory presumption under the section is that our client's application shall be granted, subject only to the provisions in subsections (3)-(6A).

In the circumstances, the only provision that is of any relevance to our client's application to change its name is subsection 3 which states as follows:

"The Commission shall refuse an application to change a party's registered name if, in their opinion, any of paragraphs (a) to (f) of section 28(4) apply to the new name."

In section 28(4) of PPRA there is only paragraph – paragraph (a) - that could apply in this case.

Paragraph (a) comprises two alternative scenarios under which the Commission may refuse to implement the change. These are if the new name would:

- "(i) be the same as that of a party which is already registered in the register in which that party is applying to be registered, or*
- (ii) be likely to result in electors confusing that party with a party which is already registered in respect of the relevant part of the United Kingdom,"*

Thus, the test is not whether the proposed new name is the same as another entity (e.g. a think tank, charity or business) or whether it will cause confusion with such an organisation. The only comparison that matters is a comparison of the proposed new name with the name of another, existing registered political party.

No reasonable basis for refusal

Having regard to the relevant statutory tests, we are therefore surprised to note the comments in the second paragraph of [REDACTED] email quoted above which we have emphasised. [REDACTED] appears to fall into error in two key respects.

First, it is not relevant to the determination of the application whether there are "a number of entities" *including* registered entities, which engage in political discourse in the UK which may or may not have names that are similar to that applied for by our client. The only entities that are relevant for these purposes are those which are political parties that are already registered as such.

Secondly, we simply do not understand [REDACTED] reference to there being a number of entities that have names similar to that applied for.

We have reviewed the register of political parties. Out of 329 registered parties, there is not a single one that is called "Reclaim", "the Reclaim Party" or which even has the word "Reclaim" as any part of its name.

Nor, as far as we can see, are there any registered political parties that have names which could possibly be described as "similar" to The Reclaim Party. Obviously, for these purposes the words "the" and "party" are irrelevant. By contrast, there are plenty of examples of parties registered which share the same words in their name or which have very similar names.

It follows, that there is no possible, reasonable basis for a finding that electors are likely to be confused if our client's proposed new name is registered.

Although PPRA is silent as to the time period for the consideration of applications for changes of details by a registered political party, a period of 6 weeks is generally stipulated as the maximum time frame for registration applications. As [REDACTED] says, this period may be longer "depending upon the facts". However, as we have demonstrated, that cannot apply in our client's case because the name situation is so clear cut. The facts are very simple. The name clearly does not bring either of the limbs of s28(4) into play. Furthermore, this contrasts with the situation for other parties whose applications appear to have been granted more quickly than our client, despite there being in those cases, a slightly less clear cut situation on the register. Earlier this week, for example, our client noticed that the Commission had granted the application by the Brexit Party to change its name to "Reform UK".

Our client was thus disappointed and concerned that despite the relative simplicity of the decision to be made by the Commission in this case, its application had still not been determined more than six weeks from when the revised application was first made. Six weeks have also elapsed since [REDACTED] confirmed

on 24 November that the amended application was being assessed. So the decision is overdue whichever date is taken as the starting point.

We accept that the Christmas holiday period has intervened. But it is one thing for the Commission to have to take time to consider an application for a new party name in circumstances where there are identical or similar names already on the register. But in the case of our client's application, this is not the case. The statutory test is clearly met and as we have observed, the statutory presumption under s30(2) is that the name change will be granted.

In his email of 23 December, [REDACTED] did indicate that a decision would be made "in the New Year". However, with elections due to take place at the beginning of May and given the constraints imposed by the current national lockdown, every week that goes by is crucial. Whilst it is true that there is nothing to stop our client continuing to use the name "Reclaim" pending acceptance of the name by the Commission, clearly it would be extremely damaging for our client if having invested in promoting its activities under that name, it were forced to apply for a different name following a late refusal by the Commission. Moreover, at this point in time, having to apply for a different name will undoubtedly severely prejudice our client's chances of being able to participate in the forthcoming elections.

The name change is not cosmetic measure. It is fundamental to the future of the party and its ability to participate in the democratic process. Clarity and removing doubt about the new name is urgently needed.

In the case of our client's application, we can see no basis on which the Commission, acting reasonably, could reach any other conclusion than to grant our client's application to change its registered name. Further, this is a determination that the Commission ought to have been able to make very quickly. At the very least it is a decision that ought not to have taken as long as it has.

Next steps

As we have observed, the consequences for our client of further, unwarranted delays in processing what ought to be a straightforward application are serious and highly unfair to our client.

We must therefore ask that the Commission proceed expeditiously to reach a decision on the name change and to communicate that decision to our client without further delay.

If the Commission has not communicated its decision to our client by **5.30pm on Monday 11 January 2021**, we reserve the right to initiate proceedings in the Administrative Court for a judicial review of the Commission's approach to this application. In such proceedings, our client would be seeking to quash any refusal decision (were such a decision to have been made by that point) and/ or it would seek a declaration that its proposed name and emblem do not offend the relevant provisions of the PPRA and that as a consequence, the changes should be entered by the Commission on the parties register accordingly without further delay.

Given that this is essentially a narrow, straightforward point, but one that urgently needs to be resolved, we would in the event of proceedings being issued, be seeking expedition from the Court. This would include seeking to have the time period for the Commission's points of dispute in such proceedings abridged to a shorter time period and for there to be a rolled up hearing for permission and a full judicial review. We would be seeking to have this case heard in January 2021 so that our client's position ahead of the forthcoming elections is not unfairly prejudiced any further delay.

We and our client very much hope that the necessity for legal action in this matter can be avoided with its attendant costs. But we do look forward to hearing from the Commission as soon as possible and in any event by no later than the deadline referred to above.

Yours faithfully



Wedlake Bell LLP

Cc Louise Edwards, Director of Regulation, LEdwards@electoralcommission.org.uk

Urgent

Rupert Grist
Senior Lawyer
Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

By email

Date 18 January 2021

Your ref

Our ref [REDACTED]/054220.0002

Direct Dial [REDACTED]

Direct Fax [REDACTED]

Email [REDACTED]

Dear Sirs

Brexit Express (BE)/ The Reclaim Party

We refer to your email sent at 17.28hrs on Friday evening.

We note from your email that you have accepted our point that it cannot be a fair process if third parties - including those who may be hostile to our client – are permitted to make representations to the Commission against the proposed name change without our client having the right to see those representations and to respond to them.

However, we are concerned that you are only now proposing to make such documents available to our client at the eleventh hour and only as a result of this correspondence. There is no explanation as to why it is only now that this is being done when you have evidently been in possession of such material since as far back as last October. What possible reason can there be for this information to have been withheld until now if, as you now seem to recognise, it is right to share it with our client?

Furthermore, the fact that the information is being released only at the last minute – a considerable time after the name change application was originally submitted, means that our client is doubly prejudiced. Not only has the Commission evidently been influenced by this, as yet unseen (by our client) material, but for all the reasons set out in our earlier letters, every day that our client has to wait for a decision is damaging and prejudicial. Our client is now expected to receive, review and deal with the disclosed information at great speed and potentially face even more damaging delays in learning whether or not its application will finally be granted. Furthermore, according to the Commission's website if a party wishes to submit a new application for a change of name in sufficient time for the forthcoming Mayoral elections, this would need to be done by no later than 31 January.

We trust that the Commission will thus forward the third party material without further delay.

In this regard, we note that you are belatedly notifying those who made representations that those representations will be shared with us, although you refer to the fact that they may be "redacted as required."

If the Commission is taking into account written representations submitted by third parties, then our client is entitled to see those representations in full – and the details of who made them. Whilst there may be legitimate reasons to redact personal data from the documents, we would remind you that under Data Protection law, in appropriate circumstances – such as here where a party is seeking to establish legal

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rights – there is an exemption from the non-disclosure provisions of the legislation (see Paragraph 5(3)(c) of Part 2 of Schedule 2 to the Data Protection Act 2018).

We note that you intend to share this material immediately with us after the 19 January date you have given to those who made the representations. Given the current Covid restrictions we should be grateful if you would supply this material immediately after that deadline expires, but via email and not by post.

We await receipt of the material as a matter of urgency and reserve all our client's rights in the meantime.

Yours faithfully

A handwritten signature in cursive script that reads "Wedlake Bell LLP".

Wedlake Bell LLP

Urgent

Rupert Grist
Senior Lawyer
Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

By email

Date 21 January 2021

Your ref

Our ref [REDACTED]/054220.0002

Direct Dial [REDACTED]

Direct Fax [REDACTED]

Email [REDACTED]

Dear Sirs

Brexit Express (BE)/ The Reclaim Party

We refer to your email of 20 January, attaching copies of the material sent to the Commission by third parties ostensibly opposed to our client's proposed name change from Brexit Express (BE) to The Reclaim Party.

1. Introduction

These disclosures followed on from our earlier correspondence in which we expressed concern about the fairness of the process under which our client's name change was being dealt with, both in terms of delays and due to the omission of the Commission to give our client fair sight of the third party objections to its application.

In your email of 18 January, you appear to have belatedly recognised the force of what we were saying in relation to the process and have now disclosed some 132 pages of documents which we assume to be the full extent of the material which we have been asking for. We shall refer to these documents as "the bundle". You have requested us to provide any comments on what is in the bundle in less than a week by no later than 26 January.

Due to the urgency of the matter (as explained in our previous letters) and given the very late stage at which the material has been disclosed, time does not allow our client the luxury of taking 5 days to respond. It urgently needs a decision to be made concerning its name change now.

This letter therefore constitutes our client's substantive response to the disclosures of third party objections made with the Commission's email of 20 January.

This means that our client is responding 5 days ahead of your proposed deadline. We trust that in view of this very prompt response, that the Commission will now proceed forthwith to make its decision and to communicate that decision to our client (and to us) without further delay.

2. General observations

Before addressing (to the extent necessary) the third party material itself, we should make the following observations.

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First, we think the Commission would agree that any third party objections to the registration of a political party (or, as here, to an application by a registered party to change its name) must be relevant to the statutory tests with which such applications are concerned. We do not need to set these out again in detail. The Commission is of course familiar with what they are.

Secondly, it obviously cannot be the case that just because a person or an organisation objects to the politics, views and philosophy of a particular individual or political party, that this fact can possibly justify a refusal to register a change of party name. Indeed if it could, no political party would ever achieve registration because there would always be someone who opposes what they stand for. Indeed, the diversity of political viewpoints and the presence of multiple political parties to represent those differing viewpoints is the very essence of a democratic society. To the extent that third party objections against our client's application are simply objections to our client and its outlook *per se*, they are clearly irrelevant and must be disregarded. Again, we think this proposition should be uncontentious.

Thirdly, from examining the material the Commission has sent to us, rather as we had feared, in the case of at least one complainant, the failure to provide our client with sight of any of the objections made has resulted in the Commission receiving a one-sided view of the issues. The omission of a critical document putting the complaint in its proper context would most certainly have rendered any decision based on that complaint procedurally unfair (not to mention unfair as to the substance of the objection). We explain this further below.

Fourthly, in our previous correspondence, we have pointed out how our client's application has been the subject of delays in dealing with it and how until yesterday it had not been given sight of any objections filed against its application. Indeed, even now, in respect of some of the third party objections whose details we have been sent, these have been redacted so as to render the complainants anonymous. For the avoidance of doubt, depending upon the timing and outcome of the Commission's decision, our client reserves all its rights as regards any legal proceedings which might need to be brought in relation to this matter, including the right to rely on any and all aspects of procedural unfairness.

Finally, we note that of the 132 pages of documents sent to us which contain the third party material opposing our client's change of name, the vast majority of these documents come from just one source, namely Reclaim Project Ltd, a small local charity based in Manchester. For ease of reference, we shall refer to them in this letter as "RPL".

In what follows we deal in turn with the third party objections that have been made, including those from RPL. It is convenient however to start with the other complaints since they can be dealt with relatively briefly.

3. The anonymous complaints from individuals at pages 112-113 and 126-132 of the bundle

As we have said, it is regrettable that the Commission has redacted the names of the complainants on these documents. This means that our client has no opportunity to examine the veracity of the complainants themselves. We do not know who they are, who they work for. Nor can we research what political or other affiliations they have or why has led them to make the complaints they have.

Fortunately, however, for present purposes, although the redactions are unfair to our client, it makes no real difference in the case of these particular objections. This is because it is obvious that none of the objections they raise have any relevance to the matters which the Commission needs to decide.

All of these complaints, without exception, are self-evidently objections to Mr Fox himself and/ or his views and those of our client. In other words they are precisely the sort of complaints that should have no bearing on the statutory tests to be applied by the Commission when dealing with a change of name.

We assume that the Commission agrees and will disregard these objections in their entirety.

4. Renew UK (pages 114 – 125 of the bundle)

At pages 114 - 125 of the bundle are documents submitted by an entity called Renew, which is itself a registered political party. However, it is clear from its email dated 14 December 2020 that rather than coming up with any reasons why our client's proposed name The Reclaim Party could be confused with

its own registered name (Renew) or cause issues for voters, Renew have simply invited the Commission to treat their previous (unsuccessful) objection to the registration of Reform UK as being equally applicable to our client's proposed name.

We respectfully suggest that this objection again should be discounted as irrelevant for the following reasons.

First, by stating that its previous objection against Reform UK should apply equally to our client, Renew UK has obviously failed to address the fact that The Reclaim Party is a totally different name to "Reform UK". Renew has not explained anywhere in the material why our client's proposed name "The Reclaim Party" should be treated as though it was the same as "Reform UK" and has the same impact on the existing "Renew" name.

Secondly, the fact-specific nature of Renew UK's objection to Reform UK is emphasised by the fact that Renew even complained about the similar blue colour adopted by Reform UK as its party colours. No such colour objection applies here. The names are very different anyway.

Thirdly, although in his email to the Commission of 14 December, Mr Clarke of Renew claims that "confusion has been occurring" he has provided no evidence of any such confusion to support this statement.

Fourthly, Renew UK's objections evidently failed to persuade the Commission that there was a valid reason to refuse Reform UK their choice of new name. This is significant. Plainly, if Renew's objections against Reform UK failed to persuade the Commission that it could refuse the latter's change of name application, then it is impossible to see how the Commission could reasonably reach a consistent conclusion if it were to now refuse the change of name to The Reclaim Party based on that earlier, different complaint.

Accordingly, there is no merit whatsoever in Renew's objections.

That leaves the 111 pages of material generated in relation to the complaints and objections by RPL. Again, we do not discern from them a viable objection under the statutory tests which the Commission has to apply.

5. Reclaim Project Ltd

RPL is a small charity based in Manchester. Its registration details filed with the Charity Commission [RECLAIM PROJECT LTD - 1139807 \(charitycommission.gov.uk\)](https://www.charitycommission.gov.uk/RECLAIM_PROJECT_LTD_-_1139807) show that it was registered on 12 January 2011 and its income and expenditure were respectively £489k and £546k for the most recently reported year. Its governing document states that the area it can operate in is Manchester although it claims to operate throughout England & Wales.

As its correspondence to the Commission indicates, RPL has not only been strenuously lobbying the Commission to turn down our client's proposed name change, but has separately threatened to sue Mr Fox and our client for the tort of passing off. It has publicised its threats and accused Mr Fox of trying to "steal its name". This is somewhat ironic given that RPL chose to adopt the same name as a small woman's domestic abuse charity called Reclaim Project (Reg No.1054264) which had existed since 3 April 1996).

At pages 5 – 37 of the bundle, we note that RPL's solicitors, Brabners, sent a lengthy letter dated 23 October and enclosures to the Commission. This opposed our client's original application to change its name to "Reclaim" – not the revised application to change the name to The Reclaim Party. This is not insignificant given the emphasis placed by RPL on the use of the single word "Reclaim".

Many pages of exhibits to the Brabners letter show material relating to our client activities when it was previously operating as "Brexit Express". The point Brabners appear to be making from that is that somehow it is not open to a political party that campaigns for an issue such as Brexit, to later evolve, rebrand itself and campaign on for different when the key issue it was previously campaigning on is no longer such a key issue (i.e. in this case Brexit).

There is nothing in the Political Parties and Referendums Act 2000 to suggest that this is a valid reason to refuse registration of a name change. If it were, then the Commission would presumably not have agreed that The Brexit Party could change its name to Reform UK earlier in the month?

Frankly we consider it bizarre that such a reason for refusal has been suggested. This part of RPL's objection seems to have no basis at all.

That leaves the principal focus of their objection, namely the idea that our client's use of the name "Reclaim", and now "The Reclaim Party" as a name somehow trespasses on RPL's goodwill in such a way as to be actionable under the English law of passing off. They claim to have a unique and overriding legal right to use the name "Reclaim" in the UK. A copy of their letter before action to Mr Fox is at pages 38-42 of the bundle in which these allegations are made. At pages 43 – 44 of the bundle is a copy of the holding letter sent by my firm in response in which we asked for further time to respond and for certain information. A copy of Brabner's response to this letter is at pages 45 – 52 and included copies of transcriptions of alleged confusion (none of which shows that anyone was misled into contacting our client, wrongly believing that they were contacting RPL – quite the reverse in fact).

At pages 56 – 58 are copies of print outs from October of Mr Fox's Twitter feed. At pages 59 – 61 are screen shots from the Reclaim Party's Twitter feed.

There are various newspaper articles about Mr Fox and his plans for a new party and further screen shots of social media pages which run up to page 94 of the bundle. Some articles about the dispute with RPL then appear, together with further social media screen shots and a repeat of the examples of so-called "confusion" evidence.

However, it is difficult to see what, if anything, these add to the relevant matters the Commission has to decide. Moreover, the social media screen shots are in any case irrelevant since they have long been superseded by new "The Reclaim Party" branding on its social media pages and website (see for example [reclaim – reclaim party](#) and [\(5\) The Reclaim Party \(@thereclaimparty\) / Twitter](#)).

6. Misleading omission by RPL

Moreover, it is in relation to the core element of their objection to our client's name change application that RPL appear to have seriously misled the Commission by omitting to provide it with a very important document. That document is the letter which this firm wrote to Brabners back on 23 October 2020, in which the allegations of passing off by RPL against our client were comprehensively rebutted. We attach for the Commission's reference, a copy of this letter and we invite the Commission to read it in full.

We make no criticism of Brabners for not including this letter at the time when they themselves wrote to the Commission on 23 October 2020. This is because when they emailed their own letter to the Commission that day, they had yet to receive Wedlake Bell's letter which was not sent until later that evening.

However, in the circumstances, we do think the onus was firmly on Brabners to have promptly forwarded a copy of our letter to the Commission after it was received. After all, earlier that day they had filed an objection to the Commission based largely around on the same issue. By not forwarding our letter, they must have known that this left the Commission with a one-sided view of the whole matter and that the omission could be prejudicial to our client.

Furthermore, there was another communication between Brabners and the Commission in December 2020. Yet even then, Brabners did not see fit to inform the Commission of our letter of 23 October. When Brabners were asked by the Commission whether, in the light of the change of name to "The Reclaim Party" instead of "Reclaim" RPL still objected, they wrote back on 22 December (page 1 of the bundle). They said this:

"We note that the Applicant has now amended the details of their application and intends to apply for a change of name to The Reclaim Party rather than just Reclaim."

*I am emailing to confirm that our client's representations and objection to the proposed change of name still stand with respect to this revised name **(we attach our previous letter for ease of reference)**. [emphasis added]."*

It is therefore clear that Brabners made no attempt to correct their earlier omission. They merely enclosed *their own* previous letter, but did not enclose Wedlake Bell's rebuttal letter of 23 October.

Further, Brabners' letter concluded with the expression of a threat against our client in the following terms:

"In addition, all of RECLAIM's legal rights and remedies are expressly reserved, including the right to take further formal action against the Applicant (in particular should the Application be successful) which would likely include seeking injunctive relief; damages or an account of profits; legal costs and interest for passing off for the use of the proposed name (or any other name) which infringes upon RECLAIM's rights."

These were similar to the threats that had been made against our client by Brabners on behalf of RPL back in October, but which were not followed up on following the sending of our letter of 23 October.

We do not propose to repeat the contents of our letter of 23 October here, but invite the Commission to read that letter. We believe it speaks for itself. In essence, the letter makes the following points:

1. The suggestion that RPL enjoys a high profile, widespread, nationally known reputation and that members of the public would invariably associate the word "Reclaim" with them is not supported by the available evidence;
2. The fact that RPL's campaign against our client using the Reclaim name briefly achieved some publicity in certain internet news sites in October 2020; it is not evidence that RPL was otherwise a well-known entity itself among the public.
3. As we pointed out in our 23 October letter, the so-called evidence of "confusion" produced in support of the claim, far from demonstrating passing off, proved that it was *our client* not RPL who clearly enjoyed a greater degree of recognition among the public by reference to the Reclaim name. All of the examples of so-called "confusion" supplied by Brabners were of people enthused by and wanting to support and work for our client, but who had mistakenly contacted RPL thinking they were contacting our client. Had there been passing off, this type of contact would have been the other way around – people would have been contacting our client after having been deceived by our client's use of the Reclaim name into thinking they were contacting RPL.
4. Thus the confusion evidence put forward by RPL does the exact opposite of what they say it does – it indicates that anyone seeing The Reclaim Party on a ballot paper is not going to be confused into thinking they are voting for a party formed by RPL. This is hardly surprising given the very different viewpoints of RPL and our client.
5. RPL is a registered charity. and one of the cardinal rules of charity law is that political parties cannot be registered as charities. Nor can charities have political purposes as their charitable objects; yet in their correspondence, Brabners appear to emphasise the degree of political involvement RPL has.

This leads on to a very important and obvious point, that since RPL could never be a registered political party itself, there is no risk of any voter being confused as to the effect of his or her vote by seeing The Reclaim Party named on a ballot paper when casting their vote.

Finally, our client's registered name – should its application be granted – will be "The Reclaim Party". By law it will not be permitted to use the word "Reclaim" on a ballot paper. Thus all of the arguments and material put forward by Brabners about the alleged use by our client of the word "Reclaim" and the suggestion that the name The Reclaim Party will be shortened to "Reclaim" are otiose. Besides which, despite the allegations made by Brabners in their email of 22 December to the Commission, our client's Twitter handle is @thereclaimparty – not "reclaim". Its website address is www.reclaimparty.co.uk and it is using a logo that has nothing whatsoever in common with RPL's own branding and which again says within

it "The Reclaim Party". In other words it is doing exactly what we had indicated in our letter of 23 October it would be doing going forward.

7. No claim

Despite the assertive manner with which Brabners put forward their client's claim of passing off, the aggressive media campaign and the establishment of a crowd funding page, no legal proceedings have been commenced against our client by RPL. More than 3 months have elapsed since the allegations by RPL first surfaced on 7 October. It is to be inferred that having seen our letter of 23 October 2020, RPL decided not to bring the threatened proceedings, either because they did not believe they could win or because our client changed its name application from Reclaim to The Reclaim Party, thus making it even less likely that there would be any ongoing issue. Indeed, we note that this point was recognised by the Commission itself when it emailed Brabners on 15 December (page 3 of the bundle) and pointed out:

*"In that case, you should be aware that the weight we give to [your previous representations about use of "Reclaim"] is likely to be reduced, **particularly in respect of the potential for the proposed party name to mislead voters.**" (emphasis added).*

In our view, it would be a strange result if our client were to be refused the right to use a rather generic term (i.e. "Reclaim") in such a way (i.e. "The Reclaim Party") as to make it obvious that it was a political party, when the only objection to that was from a small local charity that cannot be a political party. Moreover, the fact that the charity in question has made unfounded, unproven allegations – rebutted in correspondence should not be a reason, we respectfully submit, on which any reasonable public body could refuse to accept a change of a party's name.

RPL are not contending in their objections that our client's proposed name should be disallowed because of it being the same or similar to an existing registered political party. The sole basis on which their objection must be judged is under s28A(2)(e)(i), namely whether the use of The Reclaim Party "would be likely, were it to appear on a ballot paper issued at an election to result in an elector being misled as to the effect of his vote".

That is a very high hurdle to overcome and one that RPL's objections have demonstrably failed to overcome.

8. Conclusion

In summary, we do not think the Commission is likely to take issue with our analysis of the anonymised complainants whose documents are at pages 111 onwards of the bundle. These complaints are by individuals who do not like our client or its political viewpoints. They have nothing of substance to say in relation to the proposed change of name when set against the required statutory tests.

No reasonable public body in the position of the Commission could reasonably take these into account in deciding to refuse our client's application.

The objection by Renew is irrelevant for different reasons. Its objections are to the registration of a different party (the Brexit Party) under a different new name (Reform UK). Renew's objections were evidently not accepted by the Commission in that case because the Brexit Party was allowed to change its name to Reform UK. It cannot logically decide the reverse of that in relation to Renew's complaint against our client's application.

Looking at the 111 pages of documents submitted by RPL's solicitors, there is no doubt that RPL objects to our client and its leader. But its objections are either irrelevant (i.e. e.g. directed at the very right of a party to change its name and campaign on different issues to those it was previously focussed on) or lacking in substance (e.g. the allegations of passing off).

Furthermore, RPL has not itself (for whatever reason) conducted its correspondence fairly with the Commission. Whether by accident or design it did not disclose Wedlake Bell's critical letter of 23 October which comprehensively rebutted the passing off allegations. Those original objections were very much directed at use of the name "Reclaim" rather than the revised name "The Reclaim Party". The claims of confusion are misplaced.

Since there are no other political parties registered which use the word "Reclaim" in their title and since, for the reasons set out above, there is no good reason for the Commission to find that the proposed new name breaches any of the other statutory tests for registration, we invite the Commission to make a decision as soon as possible and to allow our client's application to change its name.

9. Timescale

Given the circumstances, we do not see that any purpose would be served by extending the process still further so that those who have submitted objections to the Commission can themselves file yet further material in response to this letter. After all, they are not the applicant. It is not their application. The parties' respective submissions will either stand or fall on their merits now that the Commission is in possession of a full set of those submissions. The process of dealing with name changes is not intended to be an adversarial exercise but is an administrative process to be conducted by the Commission itself having regard to the statutory tests (and the statutory obligation on the Commission is to accept the name change unless it falls foul of those provisions). Our client first applied to change its name over three months ago and submitted its revised application over two months ago – in good time to be able to campaign with that name ahead of the forthcoming local elections. As we have said previously, every day that is lost waiting on this decision is therefore especially harmful and unfair to our client.

In view of the history of this matter, the urgency of having a decision made without further delay and the obvious prejudice to our client if the process is extended any longer, we invite the Commission to now conclude this process and to provide our client with a decision by no later than 5.30pm on 26 January 2021.

All our client's accrued rights remain reserved.

Yours faithfully



Wedlake Bell LLP

Enc

Urgent

Mr Bob Posner
Chief Executive
Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

By email

Date 2 February 2021

Your ref

Our ref [REDACTED]/054220.0002

Direct Dial [REDACTED]

Direct Fax [REDACTED]

Email [REDACTED]

Dear Sirs

Brexit Express (BE)/ The Reclaim Party

We act for Brexit Express BE which is in the process of changing its registered name to The Reclaim Party.

This letter is a complaint to the Chief Executive of the Electoral Commission on behalf of our client, in accordance with the Commission's complaints procedure which says that complaints should be so directed at first instance. The matter is extremely urgent and we should be grateful if Mr Posner would please deal with it on that basis. We have apparently exhausted all efforts to have the matter resolved at an operational level within the Commission. The next step would have to be legal proceedings for judicial review which we have previously put the Commission on notice our client would do, as appropriate.

We assume that Mr Posner will have access to the Commission's file on this matter and that it is not necessary for us to attach the correspondence that has passed between this firm and the Commission in relation to this matter since 7 January 2021.

The complaint is directed to the continuing delay in the Commission making and communicating its decision in response to the change of name request filed originally in October last year and revised in November.

In response to our correspondence on 21 January, the Commission, had indicated that it would aim to make its decision "as soon as possible" thereafter and "before the end of the first week in February." If indeed the decision is forthcoming before the end of this week, then this complaint (at least in relation to the delay factor) may yet become otiose.

Summary of the complaint

In short, our client began the process of changing its name in October last year but the Commission has still not made a decision in response to the application and is apparently still deliberating over it more than three months after the process originally started. Our client's initial application was to change its name to "Reclaim" but it subsequently varied that application and sought to change it to "The Reclaim Party" on 13 November 2020. Even if that date is taken as the starting point for consideration of the application, more than 11 weeks have now elapsed and the change has still not been made. This is in spite of the statutory presumption that it the register should be so altered unless one of the statutory factors is not complied with.

054220.0002/21904085/1

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Associated offices
throughout Europe

We recognise that the normal timescale for processing a party name change of around 6 weeks, is not a statutory time frame. Nevertheless, we think our client has a legitimate expectation that such an application should have been granted long before now – especially in a case where, as here, the Commission have given no indication that there are any other grounds on which the application should fail and where there are no other political parties already registered which use the word "reclaim" as part of their name.

On 7 January, we wrote to the Commission on behalf of our client to complain about the time being taken over the decision and to explain why it was so important that a decision be made as a matter of urgency. We explained then - and have explained since - that without confirmation that our client can use The Reclaim Party name, it cannot reasonably undertake the relevant campaigning and promotional activities under that name, since it cannot be sure that such investment would be worthwhile. Thus, the fact that our client is technically at liberty to use the name pending a decision on its registered name from the Commission is, in reality, neither here nor there.

It emerged later in January following further correspondence with the Commission that unbeknown to our client, the Commission had received various representations from third parties opposed to our client's proposed name change. After pressure from us in correspondence and very late in the day, the Commission disclosed copies of that material. On analysis, once we reviewed the material, it could quickly be seen that there was no substance to the complaints. They were mostly complaints by those who simply disagree with the political outlook of our client and its leader, rather than their having any legitimate objection under the statutory tests set out in the 2000 Act. Having received copies of these submissions for the first time at lunchtime on 20 January, it took us barely 24 hours to respond to the Commission in relation to them and we invited the Commission to proceed to make a decision.

The bulk of the documents submitted to the Commission by third parties were from a small Manchester Charity called Reclaim Project Ltd (which being a registered charity cannot conduct itself as a political party anyway). RPL had provided the Commission with copies of its complaints of passing off against Mr Fox, our client's leader. However, it failed to provide to the Commission a copy of a critical document, namely our letter of 23 October rebutting those same passing off allegations.

In the circumstances, it appears to us that the process by which our client's application was being considered was unfair since, had it not been for our intervention, our client would have had no opportunity to rebut the representations made against it, nor to correct the misleading picture created by RPL of the merits of what we consider to be their misconceived complaint.

We do not see any objective basis upon which our client should not have its application to change its name approved by the Commission. Nor do we see that the continuing delay in doing so can be due to this being a "complex case" as has been suggested in earlier Commission correspondence. It seems to us to be very far from that. There is no likelihood that voters will be misled into casting their ballots for our client's candidates in the mistaken belief they are voting for anyone else.

Our client thus feels strongly that the continued delay in processing its name change is causing serious prejudice to its position ahead of the forthcoming local elections and that any further delay by the Commission in making a decision is wholly unwarranted – and grossly unfair to our client. It was concerned that on 28 January, another third party representation (comprising comments by a member of the public who simply disagrees with Mr Fox's viewpoint) was sent to us for comment, suggesting that even by that date, the decision had not yet been made.

We therefore request the Commission to proceed and grant the name change applied for without further delay and in any event by no later than the end of this week. Our purpose in addressing this complaint to the Chief Executive of the Commission is to seek to ensure that there is no further slippage. As we made clear in our letter of 7 January and subsequently, our client stands ready to initiate judicial review proceedings should this be necessary. It very much hopes that will not be necessary since its primary concern is to be able to campaign fairly and participate in the democratic process under its chosen name.

All our client's accrued rights remain must remain fully reserved.

Yours faithfully

Wedlake Bell LLP

Wedlake Bell LLP

05 February 2021 12:52

From: [REDACTED]

To: [REDACTED]

CC: Alejandro Alonso-Martinez, Louise Edwards

Hi all, Please see below the decision letter that has just been sent to the Treasurer of Brexit Express (BE), now The Reclaim Party, regarding our decision to approve their new name. The decision is shown on our website, and we are expecting the changes to be reflected on the register in the next hour. Third parties who provided comments and representations on the application will be informed of the decision later this afternoon. If you have any questions about this, please drop a line to me or another member of the reg team. Thanks, [REDACTED]
[REDACTED] The Electoral Commission electoralcommission.org.uk

From: Partyreg Sent: 05 February 2021 12:39 To: [REDACTED]
<[REDACTED]> Subject: 2021-02-05 Brexit Express (BE) - Application decision CCM:0488919 Dear David Bailey, Approval of changes to registered details I write to inform you that we have approved your application to change the registered details for your party. These changes are in effect as of 05 February 2021. These changes should appear shortly on the party's entry on the register. We have also approved your revised financial scheme and constitution. Our full decision on your application is outlined in this message. We disclosed third party comments on the application to Wedlake Bell. In addition to the comments already disclosed, a further comment was received on 29 January 2021. Alongside the other third party comments, we considered this final comment as part of our assessment. If you wish for this final comment to be disclosed to you for the sake of completeness, please let us know by replying to this email, and we will do so. Contact us immediately if any of the details outlined below or in the party's entry on the register are incorrect or are not what the party intended. Identity mark(s) that have been approved We have approved the following identity marks which will now be included in the party's entry on the register. Identity mark Name The Reclaim Party Candidates standing for the party may use these identity marks on ballot papers at relevant elections in the UK. Our duty to maintain the register We have a duty under PPERA to maintain the registers of political parties as well as to monitor, and take all reasonable steps to secure, compliance with the rules for political parties set out in PPERA. In accordance with that duty we may conduct reviews of the registers to determine whether identity marks still meet the statutory tests. This could mean that in future if we may consider that your identity marks no longer meet the statutory tests and so will remove them from the register. We may also review the party's registered details should other circumstances change, such as details of the party's registered officers or the party's registered name. Additionally, should it come to our attention that the party is not operating in accordance with its constitution or financial scheme this may also give rise to such a review. The party will normally be advised of any such review. Please get in touch if you have any further queries about this message. You can find guidance in relation to registering and maintaining a party

	<p>on our website here . Yours sincerely, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p>
<p>05 February 2021 12:39</p> <p>From: Partyreg</p> <p>To: [REDACTED]</p> <p>CC: -</p>	<p>Dear [REDACTED] I write to inform you that a decision has been reached on your client's application to change the registered details of their party. Please see the text below, which has been sent to the registered Treasurer of the party. You will also be aware that we disclosed third party comments on the application to Wedlake Bell. In addition to the comments already disclosed, a further comment was received on 29 January 2021. Alongside the other third party comments, we considered this final comment as part of our assessment. If you wish for this final comment to be disclosed to you for the sake of completeness, please let us know in a reply to this email. Approval of changes to registered details I write to inform you that we have approved your application to change the registered details for your party. These changes are in effect as of 05 February 2021. These changes should appear shortly on the party's entry on the register. We have also approved your revised financial scheme and constitution. Our full decision on your application is outlined in this message. Contact us immediately if any of the details outlined below or in the party's entry on the register are incorrect or are not what the party intended. Identity mark(s) that have been approved We have approved the following identity marks which will now be included in the party's entry on the register. Identity mark Name The Reclaim Party Candidates standing for the party may use these identity marks on ballot papers at relevant elections in the UK. Our duty to maintain the register We have a duty under PPERA to maintain the registers of political parties as well as to monitor, and take all reasonable steps to secure, compliance with the rules for political parties set out in PPERA. In accordance with that duty we may conduct reviews of the registers to determine whether identity marks still meet the statutory tests. This could mean that in future if we may consider that your identity marks no longer meet the statutory tests and so will remove them from the register. We may also review the party's registered details should other circumstances change, such as details of the party's registered officers or the party's registered name. Additionally, should it come to our attention that the party is not operating in accordance with its constitution or financial scheme this may also give rise to such a review. The party will normally be advised of any such review. Please get in touch if you have any further queries about this message. You can find guidance in relation to registering and maintaining a party on our website here . Yours sincerely, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p>

04 February 2021 19:36

From: [REDACTED]

To: Louise Edwards

CC: [REDACTED] [REDACTED]

Hi Louise, Everyone has commented on BE except Andy so I'm passing this onto you to make a decision if you think there are enough comments. Cheers, [REDACTED]
[REDACTED] The Electoral Commission electoralcommission.org.uk

From: Louise Edwards Sent: 03 February 2021 12:46 To: [REDACTED] <
[REDACTED]@electoralcommission.org.uk>; [REDACTED]

Subject: RE: PR21-04 comments due by noon Friday 5 February 2021 CCM:0288481 Dear all Please could I ask for your assistance with the BE application below – please could you look at it as soon as possible? The reason being that we have committed to issuing our decision to the party on Friday, which we can comfortably do on this timetable but could even more comfortably do if we are able to take the decision on Thursday or Friday morning. I have in mind also our Comms team who may well need to field questions once our decision is known. Let's try to give them as much of a weekend as possible by taking the decision as far in advance as we can of the weekend starting! Thanks all for your help Louise


From: [REDACTED] Sent: 01 February 2021 17:59 To: [REDACTED]
[REDACTED] Subject: PR21-04 comments due by noon Friday 5 February 2021 CCM:0288481 Dear all, Louise and Andy has come to an initial view on 7 applications (links below) and we would now be grateful for your views by noon Friday 5 February. Party name Type of assessment Black Lives Matter New party application Brexit Express (BE) Change of party name Canvey First New minor party application Chase Community Independents Group New descriptions Scotland's Independence Referendum Party New party application Scottish Family Party New descriptions UK Independence Party New descriptions Below is a list of resources for approvals board members: Approvals Board resources Briefing paper – The party registration approval board This document sets out the registration process, role of the board and the legislative tests and policy framework. Party Registration Decision Database This document contains a number of historic or complex decisions (2015 onwards) that have helped define our approach to the statutory tests. Party registration Legal Advise Log A log of legal advice requested by the registration team, including advice relevant to the interpretation of the statutory tests and for assessments. Finalised Decisions Our published registration decisions from 2018 onwards. If you are unable to provide your views by the deadline due to other commitments, please inform the party registration team and make arrangements with your delegate listed in the table below. Board Member Delegate Director of Regulation (delegated decision maker) Director of Electoral Administration Senior Lawyer (Regulation) Head of Legal Head of Policy Head of Research Head of Registration and Reporting Head of

Enforcement and Monitoring Head of External Communications Director of Communications
Head of Commission, Scotland Manager, Scotland Head of Commission, Northern Ireland
Manager, Northern Ireland Head of Commission, Wales Manager, Wales Thanks,

[REDACTED] [REDACTED] The Electoral Commission
electoralcommission.org.uk

From: Andy O'Neill Sent: 01 February 2021 17:01 To: Louise Edwards <
LEdwards@electoralcommission.org.uk >; [REDACTED] <
[REDACTED]@electoralcommission.org.uk >; [REDACTED] < [REDACTED]@electoralcommission.org.uk
> Cc: [REDACTED] < [REDACTED]@electoralcommission.org.uk >; [REDACTED] <
[REDACTED]@electoralcommission.org.uk >; [REDACTED] <
[REDACTED]@electoralcommission.org.uk >; [REDACTED] <
[REDACTED]@electoralcommission.org.uk > Subject: RE: PR21-04 application summary initial
view CCM:0288477 Thanks guys I've done the three allocated to me. Andy

From: Louise Edwards Sent: 01 February 2021 16:43 To: [REDACTED] <
[REDACTED]@electoralcommission.org.uk >; [REDACTED] < [REDACTED]@electoralcommission.org.uk
>; Andy O'Neill < aoneill@electoralcommission.org.uk > Cc: [REDACTED] <
[REDACTED]@electoralcommission.org.uk >; [REDACTED] <
[REDACTED]@electoralcommission.org.uk >; [REDACTED] <
[REDACTED]@electoralcommission.org.uk >; [REDACTED] <
[REDACTED]@electoralcommission.org.uk > Subject: RE: PR21-04 application summary initial
view CCM:0288477 Thanks [REDACTED] that's really helpful. I've done all mine. The BE one is
very finely balanced (and well-argued and presented – thank you), but you'll see I come down
on the side of being minded approve the name. Let's see what the AB think. Thanks Louise



[REDACTED]

From: [REDACTED] Sent: 29 January 2021 19:42 To: Andy O'Neill <aoneill@electoralcommission.org.uk>; Louise Edwards <LEdwards@electoralcommission.org.uk> Cc: [REDACTED] <

[REDACTED]@electoralcommission.org.uk>; [REDACTED] <
[REDACTED]@electoralcommission.org.uk>; [REDACTED] <
[REDACTED]@electoralcommission.org.uk>; [REDACTED] <
[REDACTED]@electoralcommission.org.uk>; [REDACTED] <
[REDACTED]@electoralcommission.org.uk> Subject: PR21-04 application summary initial view

CCM:0288477 Hi both, Here is the latest application summary, those highlighted are for Andy:
Party name Type of assessment Comments or decision required All for Unity Constitution and
scheme decision Black Lives Matter New party application Initial view Brexit Express (BE)
Change of party name Initial view Canvey First New minor party application Initial view Chase
Community Independents Group New descriptions Initial view Scotland's Independence
Referendum Party New party application Initial view Scottish Family Party New descriptions
Initial view UK Independence Party New descriptions Initial view Could I have your initial
comments by Wednesday or let me know if you will require more time? regards, [REDACTED]
[REDACTED] The Electoral Commission electoralcommission.org.uk

From: [REDACTED]
To: Alejandro Alonso-Martinez
CC: -

From: Partyreg Sent: 03 February 2021 12:43 To: [REDACTED]
<[REDACTED]> Subject: RE: Brexit Express (BE) - application for change of name to The Reclaim Party [WB-WB1.FID5937001] CCM:0389438 Dear Sirs, We refer to your letter today to Bob Posner, which has been passed to me to respond to. We still intend to make a decision and communicate it to your client by 5 February. In those circumstances, and in order not to delay that decision, we suggest that, as you have indicated, any of the other issues identified in your letter are addressed after that point if your client still wishes to do so. Kind regards Alejandro Alonso-Martinez Head of Registration and Reporting The Electoral Commission electoralcommission.org.uk

From: [REDACTED] <[REDACTED]> Sent: 02 February 2021 21:06 To: Bob Posner <BPosner@electoralcommission.org.uk> Cc: Louise Edwards <LEdwards@electoralcommission.org.uk> Subject: Brexit Express (BE) - application for change of name to The Reclaim Party [WB-WB1.FID5937001] Dear Sirs Please see attached. Yours faithfully Wedlake Bell LLP [REDACTED] Partner T: [REDACTED] F: [REDACTED] Please note that our bank details have not changed for several years and we have no intention of changing them in the foreseeable future. Clients can find our bank account details in our terms of business. If you receive any communication purporting to come from Wedlake Bell asking for funds to be transferred to a different account, please contact someone you know at this firm immediately and do not process any payment. Coronavirus: How to keep in touch During this crisis please try to avoid sending us hard copy post if at all possible (though we will still be dealing with this should it be necessary). Instead, if you are able to, please send any documents to us via email to your usual adviser or to post@wedlakebell.com . Please also use direct dial and mobile numbers to contact your adviser as this will enable you to become connected with your adviser as quickly as possible. Please be assured that we are working hard to meet the challenges that Coronavirus has presented and continues to present. At present, and in response to Government advice, we have enabled all of our Partners and Staff to work remotely. If, at any stage, there is a short delay in responding to any of your emails or phone calls we apologise and assure you that we will respond very shortly. Thank you for your patience and understanding. Wedlake Bell LLP 71 Queen Victoria Street London EC4V 4AY T: [REDACTED] [REDACTED] | F: [REDACTED] | DX 307441 Cheapside | www.wedlakebell.com Before printing this email please consider whether it is necessary for you to do so. Proud to be supporting The Richard and Jack Wiseman Trust as our charity of the year. The Richard and Jack Wiseman Trust aims to assist research which will ensure that Twin-to-Twin Transfusion will no longer be a threat to the lives of unborn babies and to further research causes of the

	<p>syndrome so that earlier diagnosis and treatment becomes routine with every multiple pregnancy: www.wisemantrust.co.uk (Registered Charity No. 1036690). Wedlake Bell LLP</p> <p>is a limited liability partnership incorporated in England and Wales with registered number OC351980. Wedlake Bell LLP is authorised and regulated by the Solicitors Regulation Authority under number 533172. Its registered office and principal place of business is at 71 Queen Victoria Street, London, EC4V 4AY. A list of members may be inspected at this address. The term Partner is used to refer to a member of Wedlake Bell LLP. This e-mail, and any attachment, is from a firm of English solicitors. It contains information which is confidential and may be legally privileged. If you are not the person intended to receive it or a copy of it please notify the sender by reply e-mail as soon as possible. In these circumstances please delete the e-mail on your system and do not copy or disclose its contents or take any action in reliance upon it. Please note that e-mails sent by or to any person through our IT systems may be seen by other members of the firm. This email has been checked for potential computer viruses using Mimecast technology.</p>
<p>03 February 2021 12:42</p> <p>From: Partyreg</p> <p>To: [REDACTED]</p> <p>CC: -</p>	<p>Dear Sirs, We refer to your letter today to Bob Posner, which has been passed to me to respond to. We still intend to make a decision and communicate it to your client by 5 February. In those circumstances, and in order not to delay that decision, we suggest that, as you have indicated, any of the other issues identified in your letter are addressed after that point if your client still wishes to do so. Kind regards Alejandro Alejandro Alonso-Martinez Head of Registration and Reporting The Electoral Commission electoralcommission.org.uk</p>
<p>28 January 2021 12:06</p> <p>From: [REDACTED]</p> <p>To: Alejandro Alonso-Martinez, [REDACTED] Louise Edwards</p> <p>CC: -</p>	<p>Hi all, For info, I have just sent a further email to the lawyers of Brexit Express, as we received an additional third party comment since our last correspondence with them. The comment consisted of remarks on Laurence Fox's personal views. For the sake of inbox space, I haven't included the attachment, but it can be accessed on CCM . Please let me know if you have any questions about this. Thanks, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p> <p>From: Partyreg Sent: 28 January 2021 12:01 To: [REDACTED] <[REDACTED]> Subject: 2021-01-28 Brexit Express (BE) - Additional third party comment CCM:0488877 Dear [REDACTED] Please find attached an additional third</p>

<p>CC: -</p>	<p>From: Partyreg Sent: 28 January 2021 10:03 To: [REDACTED] <[REDACTED]electoralcommission.org.uk> Subject: Additional Brexit Express third party comment CCM:0488876 Hi [REDACTED] As discussed yesterday, please find attached a redacted version of the additional Brexit Express comment, and draft correspondence to their lawyers below. A couple of things I wasn't sure about: 1. Is tomorrow too short a deadline for response from the lawyers? 2. Would the reference in the comment to the commenter's son constitute personal data and therefore need to be redacted as well? Thanks, [REDACTED] Dear [REDACTED] Please find attached an additional third party comment on your client's application, which was made after our most recent correspondence with you. You will see that some parts of the document have been redacted. This information constitutes personal information of individuals whose details are not already published on our public register. We do not consider that disclosing this personal information is necessary to allow you to respond, if appropriate, to any points relevant to the statutory tests set out in the Political Parties, Elections and Referendums Act 2000 (PPERA). Please note that our previous point still stands, namely that Laurence Fox's personal views (or the perception of those views by members of the public) have little to no bearing on our consideration of your client's application with respect to the relevant statutory tests under PERA. If your client wishes to make any submissions in response to this comments then we will consider them as part of our assessment. We would be grateful for a response by 29 January, so as to not delay the progression of the application process. Yours sincerely, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p>
<p>28 January 2021 10:02</p> <p>From: Partyreg</p> <p>To: [REDACTED]</p> <p>CC: -</p>	<p>Hi [REDACTED] As discussed yesterday, please find attached a redacted version of the additional Brexit Express comment, and draft correspondence to their lawyers below. A couple of things I wasn't sure about: 1. Is tomorrow too short a deadline for response from the lawyers? 2. Would the reference in the comment to the commenter's son constitute personal data and therefore need to be redacted as well? Thanks, [REDACTED] Dear [REDACTED] Please find attached an additional third party comment on your client's application, which was made after our most recent correspondence with you. You will see that some parts of the document have been redacted. This information constitutes personal information of individuals whose details are not already published on our public register. We do not consider that disclosing this personal information is necessary to allow you to respond, if appropriate, to any points relevant to the statutory tests set out in the Political Parties, Elections and Referendums Act 2000 (PPERA). Please note that our previous point still stands, namely that Laurence Fox's personal views (or the perception of those views by members of the public) have little to no bearing on our consideration of your client's application with respect to the relevant statutory</p>

	<p>tests under PPERA. If your client wishes to make any submissions in response to this comments then we will consider them as part of our assessment. We would be grateful for a response by 29 January, so as to not delay the progression of the application process. Yours sincerely, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p>
<p>22 January 2021 13:03</p> <p>From: Partyreg</p> <p>To: [REDACTED]</p> <p>CC: Louise Edwards, Rupert Grist</p>	<p>Dear [REDACTED] Thanks for your email dated 21 January 2021. I have reviewed your comments in response to [REDACTED] email of 21 January 2021 and I can assure you that your client's application is being taken forward as rapidly as reasonably possible, as indeed it has been to date. However, we cannot commit to providing a decision in a timeframe that does not allow us to: (a) consider your client's comments; and, (b) go through our robust decision making processes as set out in our published guidance. I am sure you will agree that it is in the interests of your client as well as of voters that the Commission exercises its duties as registrar of political parties fully and properly. Kind regards Alex Alejandro Alonso-Martinez Head of Registration and Reporting The Electoral Commission electoralcommission.org.uk</p> <p>From: [REDACTED] <[REDACTED]> Sent: 21 January 2021 19:42 To: Partyreg <Partyreg@electoralcommission.org.uk> Cc: Louise Edwards <LEdwards@electoralcommission.org.uk>; Rupert Grist <RGrist@electoralcommission.org.uk> Subject: RE: Brexit Express (BE) - application to change name to the Reclaim Party - urgent CCM:0389416 [WB-WB1.FID5937001] Dear [REDACTED] Thank you for your email. I am extremely concerned on behalf of my client at the suggestion that final approval (or not as the case may be) is not going to be forthcoming now "before the end of the first week of February". This is not even a statement that a decision will be made by that date, rather that a decision may not be made before that date. The end of the first week of February is still 17 days away. We are aware that if a political party wishes to submit a change of name application or a new emblem to be processed in time for the Mayoral elections, that would have to be done by 31 January. You are therefore suggesting that our client must wait another 17 days (itself unacceptable) but that by the time a decision is made, should that decision go against our client, it would be too late for our client to then submit an application for a different name so as to be sure of having that name accepted in time to use it.</p> <p>I must confess to being at a complete loss to understand the Commission's stance in relation to this particular application. I come back to the points already – and repeatedly - made in correspondence that the whole process of dealing with this particular name change</p>

application has been unacceptably lengthy and that such a continued further delay is completely unjustified by the facts. Even if you take receipt of my client's revised application for the name change which took place in the second week of November, the Commission has already had more than 9 weeks within which to deal with it and you are now saying that it will have taken a minimum of nearly 12 weeks (plus the month it had before that from the original application) and it still cannot guarantee to make a decision. All of this has, in the meantime, effectively prevented our client from using precious weeks' to prepare for important elections. The Commission received and in effect, sat on representations made to it without disclosing them to our client. Those representations were only provided in response to our correspondence and we have managed to respond fully to them in barely 24 hours – reflecting the urgency of the situation. Yet now, the Commission claims that it needs at least a further two weeks of deliberations and to submit the application through its "usual process of seeking views through [its] approvals board.". I should have thought that given the circumstances, the Commission would feel duty bound to prioritise this matter and expedite that process. Contrary to what you suggest, we do not regard 26 January as being "unrealistic" as a time frame. To the contrary, it is entirely realistic in view of the history of this matter and the very limited task that still has to be performed. Further, with respect, this is not a "complex case". It never has been. There is as far as we can see, no merit whatsoever in the objections that have been filed in respect of our client's application. The proposed name is not at risk of breaching the statutory tests for registration and there are no existing registered parties that share the same or a similar name. We do not understand what is taking so much time and so many deliberations to reach a conclusion. It can hardly be the submissions made by third parties. Most are irrelevant anyway, as we have demonstrated. Meanwhile the principal objector is a small, local entity that itself cannot be a political party or campaign as one because of its charitable status. I would therefore strongly request that you please escalate this matter with the Commission's approvals Board and confirm by return that it will now be processed without delay in accordance with the time frame set out in our letter of today's date. This is not a question of according preferential treatment of one party over another. It is a question of fairness in the face of a process that has been anything but fair to our client up to this point. I look forward to hearing from you but must continue to reserve all of my client's rights in the meantime. Yours sincerely

██████████ Partner Wedlake Bell LLP t: ██████████ f: ██████████ e: ██████████
w: www.wedlakebell.com _

From: Partyreg <Partyreg@electoralcommission.org.uk> Sent: 21 January 2021 17:22 To: ██████████ <██████████> Cc: Louise Edwards <

LEdwards@electoralcommission.org.uk >; Rupert Grist < RGrist@electoralcommission.org.uk >
> Subject: RE: Brexit Express (BE) - application to change name to the Reclaim Party - urgent
CCM:0389416 [WB-WB1.FID5937001] This message originated from outside your
organisation. Dear [REDACTED] Thank you for the response to the third party comments
made on your client's application. There are points which you have raised in your response
which we would be inclined to agree with. For instance, we agree that Laurence Fox's
personal views (or the perception of those views by members of the public) have little to no
bearing on our consideration of your client's application with respect to the relevant statutory
tests under PPERA. We also recognise that comments concerning an application submitted
by a different party do not have equal bearing on your client's application, particularly where
little evidence has been provided or found to support this. We will be sure to consider the rest
of the points you have raised carefully, including those made with respect to the objections
raised by RECLAIM. You have requested a decision on the application by Tuesday 26
January. It will not be possible to make a decision on the application within that time frame.
We will need to carefully consider the points you have raised (including those covered in the
other attachment), update our assessment, and follow our usual process of seeking views
from our internal approvals board before taking a final decision. Clearly, to complete all of
these steps by Tuesday is unrealistic, though we will aim to reach a decision as quickly as
possible and before the end of the first week of February. Yours sincerely, [REDACTED]
[REDACTED] The Electoral Commission electoralcommission.org.uk

From: [REDACTED] < [REDACTED] > Sent: 21 January 2021 13:22 To:
Partyreg < Partyreg@electoralcommission.org.uk > Cc: Louise Edwards <
LEdwards@electoralcommission.org.uk > Subject: RE: Brexit Express (BE) - application to
change name to the Reclaim Party - urgent CCM:0389416 [WB-WB1.FID5937001] Dear Sirs
Thank you for providing this information. Given the urgency, we are responding ahead of the
time period you had put forward as our client is concerned that this matter be concluded
urgently. Accordingly, please see our attached letter commenting on the third party
submissions, together with a copy of our letter of 23 October 2020 to Reclaim Project's
lawyers which was evidently omitted from the documents they supplied to the Commission
previously. Yours faithfully Wedlake Bell LLP

[REDACTED] Partner Wedlake Bell LLP t: [REDACTED] f: [REDACTED] e:
[REDACTED] w: www.wedlakebell.com _

From: Partyreg < Partyreg@electoralcommission.org.uk > Sent: 20 January 2021 12:33 To:
[REDACTED] < [REDACTED] > Subject: RE: Brexit Express (BE) -

application to change name to the Reclaim Party - urgent CCM:0389416 [WB-WB1.FID5937001] This message originated from outside your organisation. Dear [REDACTED] [REDACTED] Apologies – I had tried to send this earlier, but the message bounced back due to the size of the attachment. Please find attached a collation of comments we have received so far on the application to change the registered name of Brexit Express (BE) as requested. Pages 1-111 of the PDF constitute correspondence with Brabners solicitors, including attachments submitted by them; other comments are from page 112 onwards. For clarity, the images referenced on pages 118 and 122 can be found on pages 124 and 125. You will see that some parts of the document have been redacted. This information constitutes personal information of individuals whose details are not already published on our public register. We do not consider that disclosing this personal information is necessary to allow you to respond, if appropriate, to any points relevant to the statutory tests set out in the Political Parties, Elections and Referendums Act 2000 (PPERA). We have also redacted the first section of page 1 where the email was forwarded internally. If your client wishes to make any submissions in response to these comments then we will consider them as part of our assessment. We will take into account all relevant information put to us insofar as it's material to the statutory tests outlined in PERA. We would be grateful for a response by 26 January 2021, though the sooner we have a response, the sooner we can progress our assessment of the application. Yours sincerely, [REDACTED]

From: [REDACTED] <[REDACTED]> Sent: 18 January 2021 16:26 To: Partyreg <Partyreg@electoralcommission.org.uk> Cc: Louise Edwards <LEdwards@electoralcommission.org.uk>; Rupert Grist <RGrist@electoralcommission.org.uk> Subject: RE: Brexit Express (BE) - application to change name to the Reclaim Party - urgent CCM:0389416 [WB-WB1.FID5937001] Importance: High Dear Sirs Please see attached letter. Yours faithfully Wedlake Bell LLP [REDACTED] Partner Wedlake Bell LLP t: [REDACTED] f: [REDACTED] e: [REDACTED] w: [REDACTED] www.wedlakebell.com _

From: Partyreg <Partyreg@electoralcommission.org.uk> Sent: 15 January 2021 17:28 To: [REDACTED] <[REDACTED]> Cc: Louise Edwards <LEdwards@electoralcommission.org.uk> Subject: RE: Brexit Express (BE) - application to change name to the Reclaim Party - urgent [WB-WB1.FID5937001] CCM:0389416 This message originated from outside your organisation. Dear [REDACTED] Thank you for your letter, and apologies for the delay in responding to it. Firstly, you have queried what we mean by an "initial view". As outlined in our guidance (pages 24-25), there are multiple stages to our assessment process. This includes a recommendation being made by the Registration

Team to either approve or reject an application with regards to the statutory tests outlined in PPERA. Following that, the recommendation is put to the Commission's internal Approvals Board and a final decision is taken by the Director of Regulation who chairs the Board. For internal purposes, this latter stage is broken down into three stages: firstly, an "initial view" is taken by the Chair; secondly, the wider Approvals Board comments on the recommendation and initial view; and finally, a decision is taken on the application by the Chair to either approve (i.e. "grant") or refuse the application. Secondly, you have queried the relevance of third party comments. With regards to your point that PPERA does not give the right to third parties to make representations to the Commission, you will appreciate that we assess applications on a case-by-case basis against the statutory tests in PPERA, taking into account all relevant information and circumstances at the time. Inviting public comments on applications is an important stage in our information gathering process to ensure we capture all relevant information. There is no guarantee that comments that have been provided are always relevant to the statutory tests, and each comment's merit is considered carefully and reflected in the assessments. We agree that in these circumstances it is right to share the comments made by third parties with you, to the extent that we can do so under data protection legislation. We need to notify third parties of our intention to share this information, and have now done so, setting a short deadline of 5pm on Tuesday 19th January for their response. Immediately after that, we will share these comments with you (redacted as required). Please note that the timeframe we indicated for a decision on your application is based on us considering the material before us presently. If your client wishes to make further representations on any of the comments made, we will consider those in making our decision, but if those comments are not received within a short timeframe, or raise any complex issues, this will cause further delay to our assessment process (in addition to the week's delay we expect to be made by providing you with the third party comments), and therefore delay a decision being made on the application. Yours sincerely, [REDACTED] [REDACTED]
The Electoral Commission electoralcommission.org.uk

From: [REDACTED] <[REDACTED]> Sent: 07 January 2021 16:41 To: Partyreg <Partyreg@electoralcommission.org.uk> Cc: Louise Edwards <LEdwards@electoralcommission.org.uk> Subject: Brexit Express (BE) - application to change name to the Reclaim Party - urgent [WB-WB1.FID5937001] Dear Sirs Please see attached letter. Yours faithfully Wedlake Bell LLP [REDACTED] Partner T: [REDACTED]

[REDACTED] F: [REDACTED] [REDACTED] Please note that our bank details have not changed for several years and we have no intention of changing them in the foreseeable future. Clients can find our bank account details in our terms of business. If you receive any communication purporting to come from Wedlake Bell asking for funds to be

transferred to a different account, please contact someone you know at this firm immediately and do not process any payment. Coronavirus: How to keep in touch During this crisis please try to avoid sending us hard copy post if at all possible (though we will still be dealing with this should it be necessary). Instead, if you are able to, please send any documents to us via email to your usual adviser or to post@wedlakebell.com . Please also use direct dial and mobile numbers to contact your adviser as this will enable you to become connected with your adviser as quickly as possible. Please be assured that we are working hard to meet the challenges that Coronavirus has presented and continues to present. At present, and in response to Government advice, we have enabled all of our Partners and Staff to work remotely. If, at any stage, there is a short delay in responding to any of your emails or phone calls we apologise and assure you that we will respond very shortly. Thank you for your patience and understanding. Wedlake Bell LLP 71 Queen Victoria Street London EC4V 4AY T: [REDACTED] | F: [REDACTED] | DX 307441 Cheapside | www.wedlakebell.com Before printing this email please consider whether it is necessary for you to do so. Proud to be supporting The Richard and Jack Wiseman Trust as our charity of the year. The Richard and Jack Wiseman Trust aims to assist research which will ensure that Twin-to-Twin Transfusion will no longer be a threat to the lives of unborn babies and to further research causes of the syndrome so that earlier diagnosis and treatment becomes routine with every multiple pregnancy: www.wisemantrust.co.uk (Registered Charity No. 1036690). Wedlake Bell LLP

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20 January 2021 12:32

Dear [REDACTED] Apologies – I had tried to send this earlier, but the message bounced back due to the size of the attachment. Please find attached a collation of comments we have

<p>From: Partyreg</p> <p>To: [REDACTED]</p> <p>CC: -</p>	<p>received so far on the application to change the registered name of Brexit Express (BE) as requested. Pages 1-111 of the PDF constitute correspondence with Brabners solicitors, including attachments submitted by them; other comments are from page 112 onwards. For clarity, the images referenced on pages 118 and 122 can be found on pages 124 and 125. You will see that some parts of the document have been redacted. This information constitutes personal information of individuals whose details are not already published on our public register. We do not consider that disclosing this personal information is necessary to allow you to respond, if appropriate, to any points relevant to the statutory tests set out in the Political Parties, Elections and Referendums Act 2000 (PPERA). We have also redacted the first section of page 1 where the email was forwarded internally. If your client wishes to make any submissions in response to these comments then we will consider them as part of our assessment. We will take into account all relevant information put to us insofar as it's material to the statutory tests outlined in PERA. We would be grateful for a response by 26 January 2021, though the sooner we have a response, the sooner we can progress our assessment of the application. Yours sincerely, [REDACTED]</p>
<p>07 January 2021 09:26</p> <p>From: [REDACTED]</p> <p>To: [REDACTED] [REDACTED] [REDACTED] [REDACTED]</p> <p>CC: -</p>	<p>Morning Dear colleagues I've just taken a call from [REDACTED] [REDACTED], chasing their registration application. She said they've noted that the Brexit Party's application to change their name has been approved and she said that their application was submitted before this one, and wants an update as a matter of urgency. Could someone call her back ASAP please on [REDACTED]. Many thanks! [REDACTED]</p> <p>[REDACTED] [REDACTED] The Electoral Commission 0207 271 [REDACTED] direct line 0333 103 1928 advice and guidance infoengland@electoralcommission.org.uk electoralcommission.org.uk</p>
<p>23 December 2020 11:52</p> <p>From: [REDACTED]</p> <p>To: [REDACTED]</p>	<p>Hi all –FYI that the party have been updated that this will take longer than 6 weeks. The current 6 week period ends 29 Dec and we are probably looking at mid Jan for a decision. Press – if you want to talk to us about lines, I'm in today and [REDACTED] is in tomorrow but it should be similar/the same as lines we have for the Brexit Party. [REDACTED] [REDACTED]</p> <p>[REDACTED] The Electoral Commission electoralcommission.org.uk</p> <p>From: Partyreg Sent: 23 December 2020 11:49 To: 'David Bailey' <[REDACTED]> Subject: RE: Brexit Express Party change of name form</p>

CC: Alejandro Alonso-Martinez, Dan Adamson, [REDACTED] Louise Edwards, [REDACTED]

CCM:0288399 Dear David, My apologies for the delay in responding to you. Firstly, I would like to reassure you that we are actively working on your assessment. We plan to take a decision in January and we will provide further updates once the date for a decision becomes clearer. As you are likely aware there are a number of entities, some registered political parties, which engage in political discourse in the UK and have names similar to that applied for by Brexit Express (BE). We have thus needed to work through a number of considerations in order to take a decision. Where the application details changed after the initial submission, the six week assessment period was reset where our process was required to start again. Six weeks from this amendment would have been the end of this year. I recognise that our work on this application will take longer than six weeks, and that of course you are seeking a decision as quickly as possible. As mentioned above, the decision will not be this side of the New Year. We always have to balance assessing a number of applications at once, and while six weeks is our aim, as a public body we must take a reasonable decision and that can take shorter or longer depending on the facts. While I appreciate that this is not the update that you wanted, I hope that it serves to reassure you that your application is being treated with due priority and attention. Kind regards, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk

From: David bailey <[REDACTED]> Sent: 21 December 2020 14:14 To: Partyreg <Partyreg@electoralcommission.org.uk> Cc: Laurence Fox <[REDACTED]> Stephen Hazell-Smith <[REDACTED]> [REDACTED] <[REDACTED]> Subject: Re: Brexit Express Party change of name form CCM:0288399 Hi [REDACTED]

Any update on our application please? Have a great ..if strange...Christmas Best David Bailey Treasurer of ?? Party! Sent from my iPad

From: David Bailey <[REDACTED]> Sent: 15 December 2020 10:00 To: Partyreg <Partyreg@electoralcommission.org.uk> Subject: RE: Brexit Express Party change of name form CCM:0288399 Hi [REDACTED] Any news regarding the change of name application? We hoped to hear before the end of the year. Have a good Christmas Kind regards David Bailey Sent from Mail for Windows 10

From: Partyreg Sent: 24 November 2020 17:58 To: 'David Bailey' Subject: RE: Brexit Express Party change of name form CCM:0288399 Dear David, I can confirm that we have received your amended application and are currently assessing it. Kind regards, [REDACTED] [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk

From: David Bailey <[REDACTED]> Sent: 23 November 2020 14:53 To: Partyreg <Partyreg@electoralcommission.org.uk> Cc: [REDACTED] <[REDACTED]>; Laurence Fox <[REDACTED]>; Stephen Hazell-Smith <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]> Subject: Brexit Express BE
I have not heard any response to our recent submission to change the name of the Party. Were there any issues? Regards David Bailey (treasurer) Sent from Mail for Windows 10

From: David Bailey <[REDACTED]> Sent: 13 November 2020 13:45 To: Partyreg <Partyreg@electoralcommission.org.uk> Subject: FW: Brexit Express Party change of name form part4 Sent from Mail for Windows 10

From: David Bailey <[REDACTED]> Sent: 13 November 2020 13:44 To: Partyreg <Partyreg@electoralcommission.org.uk> Subject: FW: Brexit Express Party change of name form part 3 Sent from Mail for Windows 10

From: David Bailey <[REDACTED]> Sent: 13 November 2020 13:43 To: Partyreg <Partyreg@electoralcommission.org.uk> Subject: FW: Brexit Express Party change of name form part 2 Sent from Mail for Windows 10

From: David Bailey <[REDACTED]> Sent: 13 November 2020 13:43 To: Partyreg <Partyreg@electoralcommission.org.uk> Subject: FW: Brexit Express Party change of name form pt 1 Sent from Mail for Windows 10

From: David Bailey <[REDACTED]> Sent: 13 November 2020 13:42 To: Partyreg <Partyreg@electoralcommission.org.uk> Subject: FW: Brexit Express Party change of name form I received a bounce back..possibly because the file is too large. This is the signature page. I will send the other is small units! Sent from Mail for Windows 10

From: David Bailey Sent: 13 November 2020 13:30 To: Partyreg Cc: Laurence Fox ; [REDACTED] ; Stephen Hazell-Smith ; [REDACTED] ; [REDACTED] Subject: Brexit Express Party change of name form Please see the attached RP2 for The Reclaim Party change of name. I have been liaising with [REDACTED] [REDACTED] in regard to this, and hope that we can now progress. Any queries please email or call [REDACTED] Thanks David Bailey Sent from Mail for Windows 10

From: [REDACTED] Sent: 13 November 2020 11:47 To: David Bailey Cc: [REDACTED]
[REDACTED] Subject: Fwd: Fw: Hi David, Please see the signed form attached. (last photo shows signatures) I will post it out today. Kind regards, [REDACTED]

From: Partyreg Sent: 11 November 2020 16:46 To: 'David Bailey'
<[REDACTED]> Cc: [REDACTED] <[REDACTED]> Subject:
RE: Brexit Express(BE) - change of name CCM:0336420 Hi David, As mentioned in my email of 3 November, we have limited access to our offices and this will likely cause a delay in receiving applications by post. We are unlikely to receive such applications before December and will not be able to proceed with the application until we receive the amended version. I strongly recommend that you complete the application via PEF Online as this is likely significantly quicker than physically signing the form. If you have any issues with our system, we are happy to provide guidance. I can see from our system that Laurence Fox has not created login details which is likely preventing the party from authorising online. I have reset his password and he will have received an automated email from us to do this. For you to change the details of the name you are proposing, you must select the option to 'reset authorisations' under the declarations page. This will allow you to change the details before moving to authorising. I would recommend that you ensure that Laurence Fox has created login details before you proceed further. Kind regards, [REDACTED]
[REDACTED] The Electoral Commission electoralcommission.org.uk

From: David Bailey <[REDACTED]> Sent: 11 November 2020 14:15 To: Partyreg <Partyreg@electoralcommission.org.uk> Cc: Laurence Fox <[REDACTED]>; Stephen Hazell-Smith <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
[REDACTED] > Subject: RE: Brexit Express(BE) - change of name CCM:0336420 Hi [REDACTED] We had some issues trying to do the pef online, so there is a physical RPT form being circulated for signature that hopefully will be with you in the next couple of days. Presumably the Bunhill Offices still receive snail mail? The Reclaim Party will be the proposed name change. My apologies for the Capital letters! Best David Sent from Mail for Windows 10

From: Partyreg Sent: 11 November 2020 13:34 To: 'David Bailey' Subject: RE: Brexit Express(BE) - change of name CCM:0336420 Dear David, I am aware that you spoke to my colleague [REDACTED] last week about your application. Currently, your application has not been

authorised by all necessary officers and you are currently applying to register 'RECLAIM'. As explained, this is the same as the name already submitted by the party – we are aware that you are intending to change this to 'The Reclaim Party'. On a separate note, we do not accept names in block capitals. We will decapitalise all but the first letter. If we do not receive an amended application from you by 18 November, we will proceed with the application we currently have in hand for your party. Kind regards, [REDACTED]
The Electoral Commission electoralcommission.org.uk

From: Partyreg Sent: 03 November 2020 14:27 To: 'David Bailey' Subject: RE: Brexit Express(BE) - change of name CCM:0336420 Dear David, I would advise that you make the change via our PEF Online system. All of your officers have user accounts (although I note that Laurence Fox will need to create login details before you begin) and can therefore authorise the application online. If you provide the form by post there will likely be a delay in receipt of the application as we have limited access to our office facilities. If you require instructions to make the change online, please let me know and I can provide these to you. As mentioned, Laurence Fox would need to create login details before you begin. You will also be able to upload amended constitution and financial scheme to our system, which you will need to provide if you are amending the name. The system will ask for a payment, but you can simply select the pay by cheque option and we will note that you have already made a payment for this application. Kind regards, [REDACTED] The Electoral Commission electoralcommission.org.uk

From: David Bailey <[REDACTED]> Sent: 03 November 2020 09:42 To: Partyreg <Partyreg@electoralcommission.org.uk> Cc: [REDACTED] <[REDACTED]>; Stephen Hazell-Smith <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Laurence Fox <[REDACTED]> Subject: RE: Brexit Express-BE change of name CCM:0336420 Hi [REDACTED] Is the form you require the RP2 form? If so, we have a blank and I can circulate it for signature. Many thanks David Sent from Mail for Windows 10

From: David Bailey Sent: 02 November 2020 12:19 To: Partyreg Subject: FW: Brexit Express-BE change of name CCM:0336420 Hi [REDACTED] Thanks for you mail. Is there a specific form you wish everyone to sign or do they just email you individually? Many thanks David

From: Partyreg Sent: 29 October 2020 18:25 To: [REDACTED] Subject: RE: Brexit Express-BE change of name CCM:0336420 Dear David, Your email has been passed to be by [REDACTED] You are able to amend your application, but this must be authorised by all

officers. I am not working tomorrow and will pick this up with you next week. Kind regards,
[REDACTED] [REDACTED] The Electoral Commission
electoralcommission.org.uk

From: [REDACTED] Sent: 29 October 2020 16:06 To: Partyreg <
Partyreg@electoralcommission.org.uk > Cc: [REDACTED] <
[REDACTED] > Subject: FW: Brexit Express-BE change of name
CCM:0336420 Hi Reg Team, Please see below and email from Mr Bailey regarding the name
change for Brexit Express. Cheers, [REDACTED]

From: David Bailey <[REDACTED] > Sent: 29 October 2020 15:32 To: [REDACTED]
[REDACTED] <[REDACTED]@electoralcommission.org.uk > Subject: Brexit Express-BE change of
name Hi [REDACTED] We are in the middle of changing the name of Brexit Express-BE. I cannot
find the details of who might be handling the application, so I am writing to ask if you can help
me please. This is the mail I need to get to the "relevant person" but I am having some
technical issues with my email (good old Bill Gates!) and my search facility has failed. Please
advise if you can assist Many thanks David Bailey Re: Brexit Express to Reclaim name
change application You are already in receipt of a request to change the party name to
Reclaim. However, since the application was submitted an issue has developed around using
the name 'Reclaim'. A person is in the process of trademarking the word 'Reclaim' and is
making demands of the party for the use of it as our name that we consider to be
unacceptable. The party sought and received legal advice from those with a trademark
specialism and they recommend a minor amendment to the name that would resolve the
situation. They recommend our official/registered name be 'The Reclaim Party' and that this
should not result in any future trademark issues. The Party Board has agreed to follow this
advice. We would therefore wish to amend our application from 'Reclaim' to 'The Reclaim
Party'. Is this amendment to our application acceptable to the Electoral Commission or do you
require us to submit a fresh application? Our apologies for this situation. We had worked to
ensure our name was distinct from other parties already registered with the Electoral
Commission and the issues around trademarking was an unforeseen eventuality. David
Bailey Treasurer

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

From: Partyreg Sent: 15 October 2020 15:42 To: [REDACTED] Cc: [REDACTED]; [REDACTED] Subject: Brexit Express (BE) - change of party name and leader CCM:0288285 Dear David Bailey, We confirm receipt of your application to change your party name and your payment of £25 on 14 October 2020. I can confirm that we have processed your change of leader, the details of which are included below. We will shortly assess your application against the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). At this point we cannot confirm whether or not the application will be approved. I note in your correspondence that you have proposed updates to your financial scheme to reflect the change of name. Could you please provide an updated document to this effect by return email. [REDACTED]

[REDACTED]

Change of leader	Position	Outgoing officer	Incoming officer	Post/Home address	Email
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	<p>Telephone Leader [REDACTED] Laurence Fox [REDACTED] [REDACTED] [REDACTED] Please notify us immediately if the amended details do not appear as you had intended. You must notify us within 14 days of changes to the named leader, treasurer, nominating officer, and campaigns officer or additional officer (if applicable) for the party if caused by the death or termination of the appointment of that officer. For other changes, such as changes to officer home addresses or the party's headquarters address, you must notify us within 28 days . Failing to update the party's registered details where they are not correct by the relevant deadline is a contravention of PPERA which may result in a fine. You can read our Enforcement Policy here . Change of name - next steps We will publish the details of your application shortly on our ' Current Applications ' page of our website for public comment. The Registration Team will assess your application against the PPERA requirements and put it to our internal Approvals Board. This Board is chaired by the Director of Regulation who takes the final decision on an application. We aim to process an application within approximately six weeks of receiving a complete and compliant application. We may write to you during the assessment process seeking further information from you about the application. Otherwise, we will contact you again once we have made a decision. In the meantime, you can find guidance in relation to registering and maintaining a party on our website . Yours sincerely, [REDACTED] [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p>
<p>27 November 2020 09:21</p> <p>From: [REDACTED]</p> <p>To: [REDACTED]</p> <p>CC: -</p>	<p>Hello [REDACTED] Here you go: Type ID Mark – English Version ID Mark – Welsh Version Translators comments Name The Reclaim Party Y Blaid Adennill Best regards, [REDACTED] .</p> <p>[REDACTED] Cyfieithydd Cymraeg Welsh Translator Y Comisiwn Etholiadol, Cymru The Electoral Commission, Wales 029 2034 6823 comisiwnetholiadol.org.uk electoralcommission.org.uk</p> <p>From: [REDACTED] <[REDACTED]@electoralcommission.org.uk> Sent: 26 November 2020 16:11 To: [REDACTED] <[REDACTED]@electoralcommission.org.uk> Subject: The Reclaim Party translations CCM:0288403 Hi [REDACTED] Could you have a look at this name change please? Type ID Mark – English Version ID Mark – Welsh Version Translators comments Name The Reclaim Party</p> <p>Cheers, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p>

<p>26 November 2020 16:10</p> <p>From: [REDACTED]</p> <p>To: [REDACTED]</p> <p>CC: -</p>	<p>Hi [REDACTED] Could you have a look at this name change please? Type ID Mark – English Version ID Mark – Welsh Version Translators comments Name The Reclaim Party</p> <p>Cheers, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p>
<p>19 October 2020 12:42</p> <p>From: [REDACTED]</p> <p>To: [REDACTED] [REDACTED]</p> <p>CC: Niki Nixon</p>	<p>Thanks [REDACTED] for this, The only other suggestion I'd have is when you're talking about the 6 week turnaround, it might be worth mentioning that it might take longer depending on the complexity. On the other hand, I can see sense in not mentioning it at this stage as we don't want to presuppose that. Just something to consider. Thanks [REDACTED]</p> <p>From: [REDACTED] Sent: 16 October 2020 15:59 To: [REDACTED] <[REDACTED]@electoralcommission.org.uk> Cc: Niki Nixon <NNixon@electoralcommission.org.uk>; [REDACTED] <[REDACTED]@electoralcommission.org.uk> Subject: RE: Brexit Express (BE) - change of party name and leader CCM:0288285 Looks good to me. I think that is sensible about the constitution – it is mostly something that we require when parties make a change of name so it's not a big deal for reg. cheers [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk</p> <p>From: [REDACTED] Sent: 16 October 2020 15:57 To: [REDACTED] <[REDACTED]@electoralcommission.org.uk > Cc: Niki Nixon <NNixon@electoralcommission.org.uk > Subject: RE: Brexit Express (BE) - change of party name and leader CCM:0288285 Hi [REDACTED] I've put together a short LTT here . Do feel free to correct anything or indeed add any further questions that come to mind. We can update this as the application progresses. Re the statement, I've seen that the party has also been asked to / has submitted a revised constitution. I've left that out of our statement as I think it's a bit of wider admin, and may only serve for people to ask to see a copy, to which we would say that we'd only release that if it was FOI'd. Thanks [REDACTED] Communications Officer The Electoral Commission 020 7271 [REDACTED] electoralcommission.org.uk</p>

From: Niki Nixon <NNixon@electoralcommission.org.uk> Sent: 16 October 2020 11:28 To: [REDACTED] <[REDACTED]@electoralcommission.org.uk> Cc: [REDACTED] <[REDACTED]@electoralcommission.org.uk> Subject: RE: Brexit Express (BE) - change of party name and leader CCM:0288285 Thanks [REDACTED] that would be really helpful. [REDACTED] is going to be our comms lead on this, so he's the best person to discuss it with.

From: [REDACTED] <[REDACTED]@electoralcommission.org.uk> Sent: 15 October 2020 15:51 To: [REDACTED] <[REDACTED]@electoralcommission.org.uk>; [REDACTED] <[REDACTED]@electoralcommission.org.uk>; [REDACTED] <[REDACTED]@electoralcommission.org.uk> Cc: Louise Edwards <LEdwards@electoralcommission.org.uk>; Alejandro Alonso-Martinez <AAlonso-Martinez@electoralcommission.org.uk>; Niki Nixon <NNixon@electoralcommission.org.uk>; [REDACTED] <[REDACTED]@electoralcommission.org.uk> Subject: FW: Brexit Express (BE) - change of party name and leader CCM:0288285 Hi All, We have acknowledge receipt of this application and informed the party of the change of leader as well enquired about the donations issue. [REDACTED] – appreciate this is late in the day, are you able to push through an update to the register? If not it is fine for it to update overnight. [REDACTED] – Ready for this to be published on the register now. Niki – We're expecting to get a lot of comments from the public about this. I'll be leading on this assessment and am happy to talk to anyone in your team about this if necessary. Cheers, [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk

From: Partyreg Sent: 15 October 2020 15:43 To: [REDACTED] <[REDACTED]@electoralcommission.org.uk> Cc: [REDACTED] <[REDACTED]@electoralcommission.org.uk>; [REDACTED] <[REDACTED]@electoralcommission.org.uk> Subject: Brexit Express (BE) - change of party name and leader CCM:0288285 Dear David Bailey, We confirm receipt of your application to change your party name and your payment of £25 on 14 October 2020. I can confirm that we have processed your change of leader, the details of which are included below. We will shortly assess your application against the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). At this point we cannot confirm whether or not the application will be approved. I note in your correspondence that you have proposed updates to your financial scheme to reflect the change of name. Could you please provide an updated document to this effect by return email. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Change of leader Position Outgoing officer Incoming officer Post/Home address Email
Telephone Leader [REDACTED] Laurence Fox [REDACTED]
[REDACTED] [REDACTED] Please notify us immediately if the amended details
do not appear as you had intended. You must notify us within 14 days of changes to the
named leader, treasurer, nominating officer, and campaigns officer or additional officer (if
applicable) for the party if caused by the death or termination of the appointment of that
officer. For other changes, such as changes to officer home addresses or the party's
headquarters address, you must notify us within 28 days . Failing to update the party's
registered details where they are not correct by the relevant deadline is a contravention of
PPERA which may result in a fine. You can read our Enforcement Policy here . Change of
name - next steps We will publish the details of your application shortly on our ' Current
Applications ' page of our website for public comment. The Registration Team will assess
your application against the PERA requirements and put it to our internal Approvals Board.
This Board is chaired by the Director of Regulation who takes the final decision on an
application. We aim to process an application within approximately six weeks of receiving a
complete and compliant application. We may write to you during the assessment process
seeking further information from you about the application. Otherwise, we will contact you
again once we have made a decision. In the meantime, you can find guidance in relation to
registering and maintaining a party on our website . Yours sincerely, [REDACTED] [REDACTED]
[REDACTED] The Electoral Commission electoralcommission.org.uk

16 October 2020 15:59

From: [REDACTED]

To: [REDACTED]

CC: [REDACTED] Niki Nixon

Looks good to me. I think that is sensible about the constitution – it is mostly something that
we require when parties make a change of name so it's not a big deal for reg. cheers [REDACTED]
[REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk

<p>16 October 2020 15:56</p> <p>From: [REDACTED]</p> <p>To: [REDACTED]</p> <p>CC: Niki Nixon</p>	<p>Hi [REDACTED] I've put together a short LTT here . Do feel free to correct anything or indeed add any further questions that come to mind. We can update this as the application progresses. Re the statement, I've seen that the party has also been asked to / has submitted a revised constitution. I've left that out of our statement as I think it's a bit of wider admin, and may only serve for people to ask to see a copy, to which we would say that we'd only release that if it was FOI'd. Thanks [REDACTED] Communications Officer The Electoral Commission 020 7271 [REDACTED] electoralcommission.org.uk</p>
<p>16 October 2020 11:34</p> <p>From: [REDACTED]</p> <p>To: [REDACTED] Niki Nixon</p> <p>CC: -</p>	<p>Thanks. I've got the lines from yesterday's OPQs as well as the info below to use as a good starting point. I've seen that it's already updated on the register that Laurence Fox is the leader. I imagine we'll get a few questions on the donations, the nature of which we don't have details of yet. [REDACTED]</p>
<p>15 October 2020 08:03</p> <p>From: Dan Adamson</p> <p>To: Louise Edwards <LEdwards@electoralcommission.org.uk >; [REDACTED] <[REDACTED]@electoralcommission.org.uk >; Alejandro Alonso-Martinez <AAlonso-Martinez@electoralcommission.org.uk ></p> <p>CC: -</p>	<p>Subject: RE: Reclaim application Agreed Louise. D. Dan Adamson Head of Monitoring and Enforcement The Electoral Commission 020 7271 [REDACTED] electoralcommission.org.uk Please note that the Electoral Commission's offices are currently closed because of the Covid 19 guidance issued by the Government. This means that we only have sporadic access to post. Therefore, we would be grateful if, for the foreseeable future, all correspondence could be sent by email.</p> <div data-bbox="757 1077 2184 1476" style="background-color: black; width: 100%; height: 250px; margin-top: 10px;"></div>

[REDACTED]

From: Dan Adamson Sent: 15 October 2020 07:51 To: Louise Edwards <LEdwards@electoralcommission.org.uk>; [REDACTED] <[REDACTED]@electoralcommission.org.uk>; Alejandro Alonso-Martinez <AAlonso-Martinez@electoralcommission.org.uk> Subject: RE: Reclaim application Thanks Louise, noted and will await developments. And to confirm my understanding that this is not therefore a new registration but a change of name and leader for an existing party, with the potential implications for reporting that Louise outlines. D. Dan Adamson Head of Monitoring and Enforcement The Electoral Commission 020 7271 [REDACTED] [REDACTED]@electoralcommission.org.uk Please note that the Electoral Commission's offices are currently closed because of the Covid 19 guidance issued by the Government. This means that we only have sporadic access to post. Therefore, we would be grateful if, for the foreseeable future, all correspondence could be sent by email.

[REDACTED]

From: Louise Edwards Sent: 14 October 2020 18:13 To: [REDACTED] <[REDACTED]@electoralcommission.org.uk>; Alejandro Alonso-Martinez <AAlonso-Martinez@electoralcommission.org.uk>; Niki Nixon <NNixon@electoralcommission.org.uk>; [REDACTED] <[REDACTED]@electoralcommission.org.uk>; [REDACTED] <[REDACTED]@electoralcommission.org.uk> Cc: [REDACTED] Subject: Re: Reclaim application Thanks for the update [REDACTED] That course of action sounds fine. I dont think we require an updated

financial scheme to consider the name though, although it is neater to do it all at one. Don't they only need to update at renewal time? Louise

From: [REDACTED] Sent: 14 October 2020 03:33:09 To: Alejandro Alonso-Martinez; Louise Edwards; Niki Nixon; [REDACTED] [REDACTED] Cc: Registration team Subject: Reclaim application Hi all, We are now in receipt of an application to change the name of Brexit Express (BE) to " Reclaim ", accompanied by an application to replace [REDACTED] as party leader with Laurence Fox and a revised constitution that reflects the name change. We do not have a revised financial scheme, though the party have outlined the changes they intend to make to it . Otherwise, the application appears to be complete. We will confirm receipt of the application to the party, explaining that we expect the party to produce a revised copy of its financial scheme (ideally signed by the officers, or the party confirms that it remains adopted). We are due to publish an update of current applications tomorrow, and I intend to include this in it (I don't think waiting for a revised scheme should delay this). Please let me or the team know if there are any questions about this, or any objections on how we intend to proceed. Thanks [REDACTED] [REDACTED] The Electoral Commission electoralcommission.org.uk