

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

ELECTION PETITION

To the Election Court

Royal Courts of Justice

Strand, London WC2A 2LL

United Kingdom

In the Matter of the Representation of the People Act 1983

And in the Matter of the Parliamentary By-Election for the Runcorn and Helsby Constituency
Held on 1 May 2025

PETITION

Petitioner: Graham Harry Moore

34 Lime Row, Erith, Kent, DA18 4HW, United Kingdom

Email: ecp@EnglishConstitutionParty.com

Respondents:

Emma Gilthorpe Group Chief Executive Officer, Royal Mail (Royal Mail)

Mark Roberts, Chief Constable, Cheshire Constabulary

Sarah Joanne Pochin MP, Member of Parliament for Runcorn and Helsby

Stephen Young, Returning Officer, Halton Borough Council (Runcorn and Helsby By-Election
2025)

Date of Election: 1 May 2025

Date of Result Declaration: 2 May 2025

Place of Count: DCBL Halton Stadium, Widnes, Cheshire

PETITION

1. Introduction

1.1 The Petitioner, Graham Harry Moore, was a candidate for the English Constitution Party (ECP) in the parliamentary by-election for the Runcorn and Helsby constituency held on 1 May 2025, having paid the required £500 candidate deposit. His candidacy was proposed and seconded and assented to by local members and supporters as the law requires, in accordance with the Representation of the People Act 1983.

1.2 The Petitioner challenges the result of the said by-election, declared on 2nd May 2025, on the grounds that the vote count was erroneous and/or deliberately fraudulent, compounded by Royal Mail's interference through non-delivery of pre-approved election communication leaflets, Cheshire Constabulary's harassment of the ECP campaign, and the police's failure to investigate election interference, including the removal of an ECP Wikipedia page. The by-election was triggered by the resignation of Labour MP Mike Amesbury, who resigned due to assaulting a constituent on a drunken night out, an incident that, as reflected in public sentiment, left the public not amused, contributing to distrust in the electoral process. These irregularities materially affected the outcome and had a chilling effect on passive democracy by discouraging non-mainstream candidates.

1.3 The Petitioner seeks to have the election declared void and an independent recount of every individual ballot ordered in a neutral location to provide a true picture of the electorate's will, ensuring that support or lack thereof for any political party or candidate is accurately reflected by law.

2. Respondents

2.1 Emma Gilthorpe, CEO of International Distributions Services plc (Royal Mail), is named for Royal Mail's interference by failing to deliver ECP's pre-approved election communication leaflets, uniquely affecting the Petitioner's campaign.

Service Address: Royal Mail Group, 185 Farringdon Road, London EC1A 1AA, United Kingdom.

2.2 Mark Roberts, Chief Constable of Cheshire Constabulary, is named for the police's harassment of the ECP campaign, failure to investigate election interference (Wikipedia page takedown), and failure to ensure count security.

Service Address: Cheshire Constabulary Headquarters, Clemonds Hey, Oakmere Road, Winsford CW7 2UA, United Kingdom.

2.3 Sarah Joanne Pochin MP, the elected candidate for Reform UK, is named as the beneficiary of the allegedly fraudulent count and must be served as per section 121 of the Representation of the People Act 1983.

Service Address: House of Commons, London SW1A 0AA, United Kingdom.

2.4 Stephen Young, Returning Officer for the Runcorn and Helsby by-election, is named for overseeing the allegedly fraudulent count.

Service Address: Halton Borough Council, Municipal Building, Kingsway, Widnes WA8 7QF, United Kingdom.

3. Grounds for Challenge

3.1 Fraudulent and/or Erroneous Vote Count:

(a) The Petitioner received exactly 50 votes in the Runcorn and Helsby by-election, as declared by the Returning Officer on 2 May 2025 (<https://hbcnewsroom.co.uk/2025/04/30/runcorn-and-helsby-by-election-results-2025/>).

A number of major social media accounts run “live interviews” with Graham Moore two of who were local to Runcorn and Helsby. One Shaun Attwood has 2.7m subscribers and he comes from Widnes. Nick Buckley OBE 40k Subscribers (Manchester), Andy the Gabby Cabby 140k subscribers, Banaman 57k subscribers (local) LSB Productions 20K, Rise above Radio, 12k and live action day events where there was substantial local support. This amount of local social media support does not tally with 50 votes.

(b) The Petitioner also received exactly 50 votes in the Tooting by-election on 16 June 2016, following the resignation of Sadiq Khan (<https://www.wandsworth.gov.uk/council-and-democracy/elections-voting-and-registration/> , to be verified via electoral services).

(c) The constituencies of Runcorn and Helsby and Tooting are distinct, with different voter bases, candidates, and political contexts, administered by councils controlled by mainstream parties (Halton Borough Council, Labour-controlled in 2025; Wandsworth Borough Council, Conservative-controlled in 2016). The 2025 by-election included 15 candidates, none of whom (to the Petitioner’s knowledge) received identical vote totals to any prior election.

(d) The probability of receiving exactly 50 votes in two unrelated parliamentary elections, nine years apart, in separate constituencies under councils controlled by mainstream parties (Labour and Conservative) protecting the status quo, is not just strange but impossible. The Petitioner's estimate of a 1 in 40,000 "elections" chance assumes a hypothetical scenario of standing in 40,000 by-elections or general elections, which is infeasible, rendering the identical 50-vote counts statistically implausible and indicative of deliberate fraud. The use of bundle counts (typically in 25s or 50s) likely facilitated misallocation of votes, as the 50-vote result aligns suspiciously with standard bundle sizes.

(e) No other candidate in UK parliamentary by-elections or general elections, to the Petitioner's knowledge, has received the exact same vote total in different constituencies, reinforcing the impossibility of this result absent manipulation.

(f) The identical 50-vote counts in constituencies under mainstream party control, aligning with bundle sizes, indicate a predetermined and deliberate fraud in the Runcorn and Helsby count, likely involving miscounting, misreporting, or intentional misallocation of votes to protect the status quo of Labour and Conservative dominance. This obvious fraud undermines the election's integrity and necessitates a recount of every individual ballot to uncover the true result.

(g) The candidate witnessed the same type of fraud in Batley and Spen by-election when George Galloway and his electors were robbed of votes 1st/2nd July 2021. Graham Moore was a count agent for another party and did not support George Galloway's politics but wrote a statement for the election court and was willing to give evidence in chief. That statement can be made available.

(h) On the same night 1st May/2nd May by-election in Rochdale, Balderstone and Kirkholt seat Billy HOWARTH of 28 St Anne's Road Rochdale OL16 5AB an independent candidate caught them red handed in the same type of electoral fraud. He was refused a recount. This was caught on video or audio.

3.2 Royal Mail's Interference via Non-Delivery of Election Communication Leaflets:

(a) Royal Mail failed to deliver pre-approved ECP "election communication" leaflets, critical to informing voters of the ECP's platform, to local constituents, while delivering leaflets for all other candidates.

(b) Royal Mail assured the ECP campaign that full delivery was completed by 23 April 2025, but emails and statements of truth from constituents confirm non-delivery in multiple areas of the constituency, uniquely affecting the ECP.

(c) This failure constitutes election interference by preventing voters from receiving essential information about the Petitioner, likely suppressing his vote total and unfairly advantaging other candidates.

(d) The interference disproportionately harmed candidates like the Petitioner, who paid the £500 deposit to stand, creating a chilling effect on passive democracy by discouraging non-

mainstream candidates from participating, as only candidates with greater resources can overcome such obstacles.

(e) This irregularity materially affected the election outcome, particularly given the close six-vote margin between the top candidates, and undermined the democratic process.

3.3 Cheshire Constabulary's Harassment and Failure to Act:

(a) A specific Cheshire Police officer harassed the ECP campaign by imposing unreasonable demands on campaign days, including requesting, "could you furnish us with some more details – how many people are expected, what is the nature of the event, where was it advertised, what time will it be going on etc.," which were not applied to other parties or candidates, to the Petitioner's knowledge.

(b) The same officer wrongly stated that reporting election-related concerns to Gareth Frith, the designated main point of contact for election security as confirmed in Cheshire Constabulary's election police security Teams meetings and slides, was incorrect, claiming a specific procedure existed. This is false, as any police officer, especially a dedicated election security officer like Frith, whose job includes handling such concerns, is a valid reporting point for election-related crimes under UK electoral law.

(c) Cheshire Constabulary failed to investigate election interference, specifically the removal of an ECP Wikipedia page during the election period, despite being notified. The police claimed they lacked resources or inclination, constituting a failure to uphold electoral integrity. The Wikipedia page, detailing the ECP's platform and campaign, was critical for voter information, and its removal suppressed ECP visibility.

(d) These actions—harassment and inaction—disrupted the ECP's ability to campaign effectively, suppressed voter access to information, and breached fair election principles. They also created a chilling effect on passive democracy by disproportionately affecting candidates like the Petitioner, who paid the £500 deposit, discouraging non-mainstream participation and favoring candidates with greater resources.

(e) The police's failure and harassment further undermined the election's integrity, contributing to an unfair outcome.

3.4 Constitutional Violation – Ashby v White (1703):

(a) The case of Ashby v White (1703) 2 Ld Raym. 938 establishes that every elector's vote must be counted accurately, as the right to vote underpins governance by consent.

(b) The judgment holds that denying or miscounting votes violates the constitutional principle that laws and taxes are levied only by the consent of the governed. The Judgment – entrenched constitutional law also references even if the voters ballot does not affect the return of the winner it must still be allowed or recorded. In this instance Sarah Pochin MP may have had at least 50 of

ECP votes allocated to her. This would affect the result but even if Sara Pochin MP was still returned the voters need to know the true and honest return.

(c) The fraudulent count of the Petitioner's votes, compounded by election interference, campaign irregularities, and police inaction, deprived electors of their constitutional right to have their votes properly recorded and their will expressed, invalidating the result.

3.5 Human Rights Violations:

(a) The English Bill of Rights 1689 states free elections (article 8 and 9), these inalienable rights came from the English convention parliament (not an ordinary parliament) of 1688 and the trilogy i.e. declaration of reasons, declaration of rights (original contract, private law) and Bill of Rights 1689 (public law). This constitutes a constitutional prohibition official manipulation of the vote by both public and private law. Lord John Somers, AG, SG and Keeper of the Great Seal of England was one of the chief negotiators and drafter of these rights and Lord Chief Justice Holt was also the lead Judge 1. Negotiating these rights and a framer of both declaration of rights and Bill of Rights. 2. He was the lower court Lord Chief Justice with a dissenting opinion in the case of *Ashby v White* 1703 in favour of the plaintiff. He was later backed 10/2 majority by the Law Lords and Queen Anne who prorogued parliament because of the insistence of parliament that they could debate the rights of an Englishman.

(b) UN Declaration on the Rights of Indigenous Peoples (2007) and International Law on Self-Determination: Articles 3 and 5 of the UN Declaration guarantee indigenous peoples the right to self-determination and to maintain their political institutions, and the state must respect this right. This right is further enshrined in Article 1 of the United Nations Charter, which states that one of the purposes of the UN is to achieve international cooperation, including respect for the principle of equal rights and self-determination of peoples, and in Article 1 of both the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR), which declare that all peoples have the right of self-determination. The Petitioner, representing the English Constitution Party [ECP], asserts that the English people, as an indigenous group, have been denied self-determination through a fraudulent election process, non-delivery of election communication leaflets, and police interference, undermining their political representation, and violating the state's obligation to respect this right.

(c) European Convention on Human Rights (ECHR): Article 3 of Protocol 1 guarantees the right to free elections to ensure the free expression of the people's opinion. The fraudulent count, non-delivery of ECP leaflets, police harassment, and failure to investigate election interference violated this right by failing to reflect the true will of Runcorn and Helsby voters.

(d) The state's failure to promote accurate vote counting and fair campaigning breaches its obligation to respect and promote these rights, as required by UN and ECHR frameworks.

4. Evidence

4.1 Runcorn and Helsby Results: Official results published by Halton Borough Council confirm the Petitioner's 50 votes (<https://hbcnewsroom.co.uk/2025/04/30/runcorn-and-helsby-by-election-results-2025/>).

4.2 Tooting 2016 Results: Wandsworth Borough Council's electoral services confirm the Petitioner's 50 votes (<https://www.wandsworth.gov.uk/council-and-democracy/elections-voting-and-registration/> , to be verified via FOI if not publicly available).

4.3 Statistical Analysis: The Petitioner asserts that the identical 50-vote totals are impossible absent fraud, to be supported by expert testimony or statistical modelling demonstrating the implausibility of such a result without standing in 40,000 elections.

4.4 Royal Mail Non-Delivery: Emails from Royal Mail confirming delivery of election communication leaflets by 23 April 2025 and statements of truth from constituents confirming non-delivery of ECP leaflets, while other candidates' leaflets were delivered. [Attach statements or note they will be provided at hearing].

4.5 Cheshire Constabulary Harassment and Inaction:

(a) Emails and witness statements documenting harassment by a specific Cheshire Police officer, including the unreasonable demand to "furnish us with some more details – how many people are expected, what is the nature of the event, where was it advertised, what time will it be going on etc.," and false statements about reporting to Gareth Frith, the designated election security officer. Police constables and the Chief Constable are "crown servants" by oath not employees of a corporation as per commercial law, but crown servants as per the common law constitution. This fact comes from their oath and open and signed statement from the police federation chairman in an address to the police and public.

(b) Correspondence or statements confirming police notification of the Wikipedia page takedown and their refusal to investigate due to lack of resources or inclination.

(c) Cheshire Constabulary's election police security Teams meeting records or slides designating Gareth Frith as the main point of contact for election security.

4.6 Count Irregularities: Media reports note a Labour-requested recount due to a four-vote initial margin, with "doubtful ballot papers" reviewed, suggesting potential errors (The Guardian, 2 May 2025). Observations of bundle counts (in 25s or 50s) during the Runcorn count, potentially leading to misallocation, to be supported by witness statements.

4.7 Count Observations: The Petitioner, Graham Harry Moore, was present at the count with other count agents and will give evidence in chief regarding observed irregularities, including bundle miscounts (in 25s or 50s), doubtful ballots, and potential fraud, supported by statements from other count agents.

5. Relief Sought

The Petitioner respectfully requests the Election Court to:

5.1 Declare the Runcorn and Helsby by-election result of 2nd May 2025 void due to a fraudulent and/or erroneous count, Royal Mail's interference via non-delivery of ECP election communication leaflets, Cheshire Constabulary's harassment of the ECP campaign, and police failure to investigate election interference, all of which had a chilling effect on passive democracy and violated self-determination rights.

5.2 Order an independent recount of every individual ballot, not just bundle counts, to be conducted in a neutral area, county, or shire outside the jurisdiction of Halton Borough Council or Cheshire Constabulary, with a completely independent counting team appointed by the Electoral Commission and official observers from impartial bodies (e.g., Electoral Reform Society) to ensure transparency and accuracy, addressing the potential misallocation facilitated by bundle counts in 25s or 50s. Because of the seriousness of this situation the court could order dominion electronic counting machines in London housed at the Excel Centre, Olympia etc. A single machine can optically scan these types of ballots, one thousand per minute and accurately tabulate all candidates. The court could order both types of recounts.

5.3 Show the people the exact ballot votes, providing the electorate with a true picture of the results, which may reveal support or no support for any political party or candidate, including whether the Labour and Conservative Parties have sufficient support or lose their deposits by failing to secure 5% of the vote or that Sara Pochin MP was misallocated votes. While the Petitioner does not agree with the politics of Reform UK, the electorate's true choice for any party or candidate must be shown by law, as required by the Representation of the People Act 1983, Article 3 of Protocol 1 of the ECHR and English constitutional law, to restore public trust in the electoral process, especially considering public dismay over the previous Labour MP's assault on a constituent.

5.4 Investigate the roles of the Respondents in contributing to or failing to prevent the fraudulent count, leaflet non-delivery, campaign harassment, and election interference.

5.5 Grant such further relief (Punitive damages and financial deterrent) as the Court deems just, including costs.

6. English Constitution Party

6.1 The Petitioner is the leader of the English Constitution Party, which stands for the rule of law, individual rights, constitutional governance, and National self-determination (England).

6.2 The fraudulent count, non-delivery of ECP election communication leaflets, police harassment, and failure to investigate election interference undermine the ECP's mission to ensure fair representation and consent-based governance, as articulated in *Ashby v White* 1703, UN self-determination principles, and human rights law, and deter non-mainstream English candidates from participating in democracy.

7. Declaration

I, Graham Harry Moore, I undertake to provide security for costs as required by law.

I Graham Harry Moore believe that the facts stated in this witness statement are true. I

understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: _____

Date: 15 May 2025

Filed at:

Election Petitions Office

Room E15, Royal Courts of Justice

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Appendices:

Witness statements from constituents for non-delivery of leaflets.

Graham Moore witness statement.

Billy Howarth witness statement.

Witness statement Valerie Philips count agent.

Expert witness statement Nigel Jacklin statistician