

Witness: S. Paris
Party: 1st Claimant
Statement No: 1
Dated: 16/2/2015

CLAIM NO: 3SA90091

IN THE HIGH COURT OF JUSTICE
SWANSEA DISTRICT REGISTRY

MR STEPHANE (AKA STEVE) PARIS

First Claimant

MS ANGEL GARDEN

Second Claimant

-and-

DR ANDREW LEWIS

First Defendant

MRS MELANIE BYNG

Second Defendant

WITNESS STATEMENT OF FIRST DEFENDANT MR STEPHANE PARIS

I, MR STEPHANE PARIS of 9 Lon Bryngwyn, Swansea SA2 0TX make OATH AND SAY that:

1. I am the First Claimant in this matter. I am a filmmaker, freelance writer, technical consultant, online publisher, husband and carer to Angel Garden, and father of three young children.
2. I adopt and agree with the statements made in the statement of my wife Ms Angel Garden dated 16 February 2015 in their entirety.
3. I however make the following comments in addition to the events surrounding the visit of Mrs Byng's son, Joe to our home that occurred during Angel's absence.

4. During our initial communications with Melanie Byng, she was very supportive of our attempts to highlight the terrible way the Titirangi Rudolf Steiner School had treated my family. Through this we learned that the unchecked bullying our eldest child experienced, and the community shunning and smearing we suffered was not an isolated incident, but a recurring theme of these schools worldwide (refer to “2009-11 [Nov]-21”, “Lies, Damned Lies, and Steiner Education”, “Carol’s Couch Waldorf Rant Part 1” from the Claimants’ disclosure), such as:

“There is nothing in your story that I have not heard many times before from parents of children at Steiner schools, except the specific detail of an axe being involved. The one big difference is that you have documented it so well. It seems to be standard operating procedure that when parents draw attention--no matter how courteously and discreetly--to inappropriate behaviour or inadequate supervision by teachers at Steiner schools, their children are made to suffer, the parents are shunned, and the children and/or their parents are badmouthed to the rest of the school community. It all too frequently ends with the children being booted from the school, if the family has not already left in anger” (Nov 2009),

“1. When the parents complain and request a meeting, the school deliberately procrastinates delaying the parent alerting the authorities; 2. A meeting is finally arranged where a very different (Anthroposophical) interpretation is given by the teachers/trustees in an attempt to manipulate the parents into thinking there is no problem; 3. The parents become so frustrated they make contact with the authorities; 4. The school may expel the child at this point and start a smear campaign telling the community (including the children) there is something wrong with the parents/child who has filed the complaint; 5. The authorities request the notes, the school 'loses' the notes; 6. In order to further suggest the parents/child are at fault a trespass notice is issued; 7. When all else fails the schools have been known to make anonymous calls to social services.” (Aug 2010),

“you would get conflicting testimony because you would get the lies spread around the school to counteract the damage that could be done if people knew the truth. I heard many stories as to why children and their families were to blame for situations that led to their leaving our Waldorf school. I sometimes heard the parents' side of the story but usually gave the school the benefit of the doubt because I was one of those people who thought the school was wonderful and could not believe that any school could be capable of some of the things parents claimed had happened. Then it happened to my family, and then I heard the lies that were going around the school. That's when I learned for the first time that truth and integrity — things I value — were not valued at our Waldorf school. Since then, I've heard many, many stories from parents around the world that indicate deception and lack of integrity are systemic in Waldorf education” (Sep 2010),

“when I began to voice my concerns, life became extremely difficult” (Sep 2010),

“Instead of the teachers and the head of a school handling terrible situations caused by a specific teacher (or even the head of a school), Waldorf does the opposite. They turn the victim and victim's family into criminals worthy of expulsion. They literally demonize the whole family and create gossip and injury to the children” (Sep 2010))

5. When Angel's mother was suddenly diagnosed with advanced lung cancer, we decided as a family, to travel back to the UK. It was during this period, when we were living either in a caravan to be near Angel's mum, or in a small house in France, all the while home educating our children, that we met Melanie Byng in person. She was extremely positive and and on learning that we were considering relocating back in the UK due to Angel's mother's health concerns, she insisted that we come and have a look at Sands, her local democratic school, which she said had helped her son Joe get over his negative Steiner experience, and which could help our eldest daughter get over the trauma of her own Steiner ordeal. Mrs Byng offered for Angel and I to come and stay at her house for a day in order to see if the area and the school would work for us. During this visit, realising how

much we were dealing with, she offered for her son Joe to come and stay with us to help out around the home, and with looking after the children, in exchange for him learning a little French.

6. The Byngs were informed that the house in France was literally in the middle of nowhere, that I would be incredibly busy the first week due to a highly unusual workload of articles I needed to write, and that Angel wouldn't be there during that same week. Our concerns were emphasised, as we did not want any further difficulties. Mrs Byng brushed them aside and assured us that Joe was coming to help us. She stated that he was very reliable.
7. Joe arrived at our home late at night on Saturday the 6th of August 2011, along with Angel's brother and his son. Joe introduced himself to us as "I am your servant". This was obviously a humorous thing to say of course, but it did show that he knew this wouldn't be a holiday, at least not for the first week while Angel was away. Angel, her brother and his son left the very next day.
8. As anticipated, I was incredibly busy that week with dozens of articles and reviews to write for various editors. Joe spent some time tutoring the girls and looking after them. They went on walks and had fun in the blow-up pool. At other times, the children would watch TV in the house or play while he spent time on his own in the caravan (which doubled-up as the guest room). I did all the rest.
9. Joe came with us to do the shopping and other visits of that sort. He borrowed the bike to travel to the next town. I was reticent at first since we don't have a lock for it and I was concerned it might get stolen, but I thought it was a good idea for him to see the nearest village on his own and I let him do it.

10. We did our best to include him considering my unusually high work constraints. In fact, on the 11th of August, two days before his decision to leave, I asked him how things were going, knowing that my work schedule had limited my involvement for days. I also felt bad because I hadn't had the energy to even think about speaking French to him. He told me everything was fine and that he was still planning on staying for about a month. I also told him things would get easier the following week, once Angel comes back and my workload eases.

11. Two days later in the early afternoon of the 13th of August, he suddenly came into the room I was working in and asked me if it was ok for him to leave on Tuesday the 16th, the day Angel was due to return. I was of course extremely surprised, especially considering our conversation two days prior. I was also in the middle of writing an article and asked him if we could discuss it a bit later, in about 30 minutes time. This was not the answer he wanted as he remained by the door and asked again. I repeated my answer: please let's discuss this once I've done my work. Again, he just stood there and asked again. I tried to get him to understand that I was working and would like to discuss this later. Since he wasn't leaving, I told him that of course he could leave but please not to make a decision until we discussed it fully once I had finished my work. He then left.

12. Once my work was done, I went to talk to him. He told me that his decision to leave wasn't based on anything that had gone on, that everything was fine, and that he had been well fed and looked after; he was just a little lonely, missing his friends and wished to attend his girlfriend's 18th birthday party. I have since learned through the documents that have been disclosed during these proceedings that this was not true, Joe had in fact been unhappy, complaining about the food, how much he had to look after the children, how boring the place was, and that he had just pretended that everything was fine, hoping that things would improve without pointing out that there was in fact a problem, even when I asked

him directly (tab 26 of the defendants' disclosure). None of this he had told me, even during our conversation about this very matter just two days prior, so I could only base his decision to leave on what he was telling me now (in fact tabs 28 and 75 shows how the story evolved from, for instance, not liking the food - but not bringing that to my attention so I can do something about it - to offering Joe "very little food" or "barely any food").

13. I asked Joe if he would change his mind if we could find some other things for him to do, to which he agreed. With that in mind, we drove to the local village and went to the little tourist office. As suspected, the options were pretty meagre. Regretfully, we ourselves didn't know the area at all, so I could not recommend any places of interest, and we also didn't know anyone we could ask.
14. Joe told me he wanted to leave on the day Angel was due to arrive. He thought this would save me from driving to Bergerac twice. I was not overly keen at the idea of having the children stuck in the car for hours: the GPS device I used at the time told me it would take about 2 hours to get to Bergerac, making this potentially a hot 4 hour journey (taking traffic into consideration), with 3 young kids in tow (aged at the time, 11, 7 and 5). Not an ideal solution.
15. My hesitancy was confirmed on informing Angel and her mother, who were both very distressed at the idea. After a series of highly stressful days dealing with the imminent bereavement, trying to come to terms with the fact that it was highly likely that her mum would not survive for much longer, Angel needed time to discuss these matters with me without potentially over-excited and hot kids in tow who would've been stuck in a small car for 4 hours, when she had been given the expectation of having some help. Her mother was also quite upset that this help would not be there for Angel and felt that it was important that we, Angel and myself, had some time, even just a car journey, alone

together to discuss our options. Angel asked me if Joe's departure could be changed.

16. There was no possibility to find a babysitter to look after the kids while I took Joe and brought Angel back. We were in the middle of nowhere, there were no babysitting services, and we didn't know anyone to look after them. If Joe insisted on leaving at the same time, the children had to come with us.
17. We tried to see what could be done about changing the date of Joe's departure but it wasn't possible, and it was at this point I found out that Joe's plane ticket had already been booked.
18. Despite the problem that had arisen and the additional stress this was causing, there was a Fête in the local village that evening and I thought it would be good if Joe came with us, so I invited him to join us. He seemed surprised at the offer but I was pleased he'd decided to come, and we had an enjoyable time.
19. The next day, I tried to see if it would be possible for Joe to move his ticket by a day or two if we paid the difference, so that Angel could benefit from the two hour drive with me before he left, but this was not possible either: Joe told me he'd also booked his train ticket from the Airport back home and it couldn't be changed (disclosure revealed that this was not true as his parents had arranged for someone to pick him up from the airport - Tab 26 of the Defendants' disclosure).
20. I discussed with Richard, his father, about possibilities. By then, Angel and her mother had decided that Angel should herself leave her mother a day earlier to spare the children having to come in the car, and for her to have two hours with me alone on the drive back so we could discuss what to do next. The discussion with Richard centred around how Joe

would get to the airport. There were two possibilities, he could either go by train or I could drive him. It was agreed between us that if we split the cost of Angel changing her plane ticket (£40 each), I would drive Joe to the airport (File “2011-08 [Aug]-14 at 13.13” of the Claimants’ disclosure). I mentioned this agreement to Joe.

21. The whole episode was extremely stressful for everyone, including my mother-in-law who was very worried about it. It created so much stress for Angel that she’d forgotten to book her wheelchair for the airport. I had to do that myself on the day she was arriving (File “2011-08 [Aug]-14 at 23.26” of the Claimants’ disclosure).

22. I drove to Bergerac on Monday to pick up Angel and realised my GPS was wrong about the time it took to get to the airport. Instead of 2 hours, it took around 1h15 to 1h30 I had never been to Bergerac before so had no way of knowing that the GPS wasn’t accurate.

23. When we came back, I realised Joe had not looked after the children that morning, nor had he given them breakfast. It appeared as if he’d remained in his room during the whole time I was away. We spoke and tried to understand what had gone wrong during the week he had been there. He and I had a long conversation about what happened and we agreed that he should have communicated more. This would have avoided all the stress of the apparent sudden change of mind. Angel was concerned at the state of the house: neither him nor I had done much tidying up during the week. Me driving Joe the next day would mean that Angel, who is walking impaired, would end up having to do the tidying up herself or just sit in a mess for hours.

24. We therefore suggested to Joe two possibilities: either he can help me tidy the house up and I’ll drive him to the airport the next day, or I would drive him to the train station instead, thereby allowing me to come back sooner and tidy the house on my own; this would mean

Joe would have to get up much earlier. He didn't hesitate and chose to help tidy the house (the documents disclosed during this proceedings revealed however that even though he had apparently happily made that agreement, he complained bitterly about it to his parents "I don't think I should be made to clean their fucking house" (Tab 26 of the Defendants' disclosure); disclosure also reveals that this action was a source of great anger for Mrs Byng: "they'd said Steve would take him to the airport if he cleaned their house - imagine - if he cleaned their house. Dear dog" (Tab 28 of the Defendants' disclosure), even though Joe had specifically been sent to help us at a time of great stress, upheaval and impending bereavement for my family, and the mess he helped clear up was his own; references were made to Angel's cleanliness: "she is slovenly too, says Joe" (Tab 206 of the Defendants' disclosure), even though she wasn't even at the house during Joe's stay; that "Joe says she's not walking impaired, she's just fat" (Tab 117 of the Defendants' disclosure), to totally dismiss her physical impairment; and the spread of serious and damaging allegations as to Angel's mental health and her being a danger to herself and her children, using her husband's mental health credentials to back up those groundless claims: "Angel has a borderline personality disorder. This is a clinical judgement, not a personal opinion. It isn't simply depression. It makes her very dangerous, but luckily for us and sadly for others the danger is to those close to her" (Tab 69 of the Defendants' disclosure), "A couple of incidents (which had little to do with their project) convinced us that she is unstable" (Tab 73), "Richard had had a long phone conversation with Angel about her mother's cancer treatment, from which he'd drawn a few conclusions. Richard is a GP & academic & an expert in primary care mental health, including personality disorder" (Tab 75), "I think [Richard] made that analysis in his spare time" (Tab 206), "If the diagnosis is accurate she might even have made threats to hurt [her children]. Or herself. Or [Steve]." (Tab 58)).

25. Joe didn't tidy on his own of course, I cleaned up alongside him. On the morning of his departure, we swept the kitchen/living room and while I tidied up the two bedrooms, he mopped the small bathroom, but did not appear to know how to do that properly, making it necessary for Angel to show him.
26. Then Joe wanted to leave. I reminded him that my GPS had been wrong and we had more time than I had thought, so we didn't need to leave as soon as originally planned. I had to repeat that to his father who called about the same thing (Joe represented his father as being "very anxious" about lateness and flights, whereas in fact Joe called him in order to get me to change my mind about what time to leave). I tried to explain again that the trip was shorter than my GPS had told me, but I could see that this wasn't getting through so we left as if the trip took two hours.
27. Joe and I spent the whole journey discussing Sands school, friendships and opportunities, and what my daughter could look forward to there. Joe had taken his role in interesting her in Sands school seriously all week, and she was beginning to consider doing their try-out week.
28. Once we arrived at the airport, I asked him for the £40 that had been agreed with his father earlier, which he took from the Airport's cashpoint (disclosure revealed that this agreed sum was later referred to by Mrs Byng as "Steve then fleeced Joe (he is 17) for the price of her changed flight - taking his euros away from him just before he got on the plane" (Tab 28)), and "Steve fleeced Joe for all the money he had on him" (Tab 75 of the Defendants' disclosure) (In fact, he also told his mother that he had to purchase a new bag at the airport after I had gone (Tab 26)). We shook hands and he promised to call us once he got home to let us know he got back safely. That was the last I heard of him.

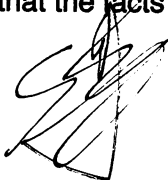
29. While waiting to hear back from him, I texted Richard a few times over the next few days to ask what to do about the mobile phone Joe had ordered which had arrived after his departure. I never got a reply from him.
30. Not having heard from Joe, I called their house to make sure everything was ok and he had returned home safely. His younger brother handed Joe the phone but as soon as Joe heard my voice he hung up.
31. This was extremely puzzling and distressing and the phone was not picked up again that day, as I tried a few more times to reach them and just got the engaged tone.
32. Angel tried to communicate with them via email over the next few days but again, got no response (files "22-1-1 (18-8-2011)", "22-1-2 (19-8-2011)", "22-1-3 (20-8-2011)", "22-1-4 (23-08-2011)" from the Claimants' disclosure). We had no idea if their offers of help still stood, or if our 11 year old daughter was still welcome at their house to try out Sands school. We were completely in the dark and unable to understand what was going on. Angel didn't even get any response from Mrs Byng about the latest version of the draft article for the Local Schools Network she had been writing with her help. This understandably increased our stress greatly, all while Angel had to deal with her mother's situation and care and we had to look after our children away from our home in New Zealand. We have since learned during these proceedings that the Byngs purposefully stopped communicating the moment Joe got on the plane ("I blocked [Angel] the minute I knew Joe was on the plane home" (Tab 30 of the Defendants' disclosure)), even going as far as warning Sands about us to stop our daughter from enrolling there ("we feel we have to talk to Sands" (Tab 31)), all without saying a word to us, or explaining why.

33. What was greatly confusing and distressing to us was that in her last main email to Angel of the 13th of August, Mrs Byng had made it clear that despite the fact that Joe was leaving much earlier than planned, it wouldn't affect the other offers she'd made to us, such as inviting our child to stay with her while she tried Sands out for instance (File "22-1 a24 Email 24" of the Claimants' disclosure). Angel had often said to me that Mrs Byng must have had taken offence with us asking Joe to help tidy up because of Angel's impairment, and I could never accept that, until the documents revealed through disclosure confirmed that she had been right all along, and this had in fact been the root of all the problems. (see paragraph 24 above).

34. We were left dumbstruck, stressed out and very hurt by this experience, but we did our best to move on and put it behind us. However, documents released in disclosure showed that Mrs Byng contacted three Steiner critics extremely early on (in late August 2011, the day after Angel had published the article Mrs Byng had suggested she write for the Local Schools Network website, and before we even wrote about any of this experience, mention it to anyone, or write anything for that matter on any Steiner critic blog since Joe's departure) to warn them that we weren't to be trusted, and giving them a distorted version of what took place while Joe stayed with us as justification for casting doubt on our work regarding Steiner education, and our experience at the school in general (tab 28 of the Defendants' disclosure). These very people, Alicia Hamberg, Diana Winters and Pete Karaiskos, would mob us shortly afterwards on Alicia Hamberg's blog beginning the long campaign that has led to these proceedings.

I believe that the facts in his statement are true.

Signed:

A handwritten signature in black ink, appearing to be 'C. J. ...', written over a horizontal line.

Dated:

16.2.15