

**Transcription of fresh video evidence after the break at an “Open”
Meeting of Skeptics in the Pub in Bath - 14/5/2013 (21:00:16 - 21:10:16)**

**AG - Angel Garden
AL - Andrew Lewis
SP - Stéphane Paris
M1 - Man 1
W1 - Woman 1**

AG - [inaudible]

AL - ah, you are. Yes.

AG - I'll just leave it there

[inaudible]

AG - we can talk about it, but I just want to make sure...

AL - I have no intention of talking about it as you know, ok?

AG- that's fine...

[inaudible]

AL - I have no intention of picking that envelope up either

[inaudible]

AL - I have no intention of touching it. OK?

AG - Fine.

SP - It's not ebola.

AL - seriously no intention of touching it, ok? I've explained very clearly to you I want nothing to do with you, ok?

AG - that's not what you said last time...

AL - You've got a cheek coming along to be honest.

SP - Why?

AG - I don't think so. Why?

AL - And, that's it, that's all I've got to say

AG - OK, that's fine.

SP - Why do we have a cheek to come along here?

AL - That's all I've got to say

SP - That's not very scientific, is it.

AG - that's not very welcoming, is it?

SP - No, not at all.

Organiser - well let's have some questions then... who wants to start?

AL - In fact i'm going to... I'm very sorry. these people here have given me a little bit of a tough time over the past year and I've no intention of engaging with them, and so I'm going to call it quits for this evening actually. I'm really sorry about that. I really don't want anything to do with these people. Thanks very much for coming along this evening, but er, I hope that's been enjoyable, but maybe next time, so er

? - Thanks for coming Andy

[applause]

SP - that's not very [inaudible] is it.

AG - Aren't you going to tell people why?

SP - or provide some evidence?

AG _ We haven't said anything

SP - you know that's the skeptical thing to do, isn't it? to ask for evidence?

AL _ you're quite free to say what you like, I will not say anything more to you.

SP _ Well you haven't really said anything to us at all really. ... We've emailed that to you as well, so it's on your computer by the way. We just wanted to make sure you had it.

? - what's up next for Bath?

Organiser - ok, we don't have any talks planned if you keep an eye on the website well hopefully... we don't have anything next month: we have a social one ...

SP - I didn't realise he was so afraid

AG - so what?

SP - afraid.

AG - yeah I don't understand it

Organiser - but feel free to stick around now and have a chat and stuff for half an hour, you know, no-one's kicking us out.

AL - thanks very much everyone, bye-bye. If I ever see you again, if I ever see you near any of my family or anything like that, I will call the police, ok?

SP - your family?

AL - I will call the police

SP - When have I been near your family? [or We've never been near your family]

SP - so he's got the email

AG - that's right. he's definitely got the email.

SP - Oh well.

AG - [inaudible]

SP - Is that sufficient?

AG - Isn't it interesting there's nobody...

SP - No, nobody wants to know

AG - Nobody wants to know about... he's dying to...

SP - or him

AG - [inaudible]

SP - I don't know.

AG - He was unable to continue

SP - no, well he was already on his way. What did he say when he saw you?

AG - he said er no actually I'm not going to do that

AG - Did you get all of that?

SP - I think so. Hope so.

SP - my god he must be really ... he must be terrified

AG - terrified. Really really scared. But why not just deal with it, you know?

SP - it cost me £2.40 to copy, to photocopy that. Him saying what he said about his family, means he got the email because it had the address

AG - well his address was on that. His address was on the letter, on that...

SP - was it?

AG - yeah. There is the letter he wrote to [Tucker months (?)] and on that letter,... it doesn't matter that he picked that letter up, he's already got it

SP - you're tweeting, are you?

AG _ I don't know. He probably will.

SP - we got no network

[inaudible]

AG - that's incredible. skepticism is...hmm...

SP - well, we're coming home early then.

AG - it's just amazing that um you can try to have an ordinary bit of communication about something that's really important...

M1 - so hmm, I'm sort of interested in what the story

SP - ah, somebody is.

M1 - what the story is.

AG - we're people who have successfully taken a Steiner school to human rights tribunal over bullying and who Andy has, over this period of time, he said he's given us a hard time, we've given...

SP - we've given him a hard time...

AG - has been deliberately just suppressing all knowledge of and in fact spreading defamatory stuff about us

SP - lies about us

AG - that we've got evidence of, but he doesn't want to know about. So in answer to his, we've sent him this invitation to address it, you know, rather than having to go down any legal things about it because it's very destructive to our reputation, and he just will not engage with us. So we actually thing, when he's sitting up there talking about Steiner schools being misleading, he's misleading people. He's misleading people by telling everybody that it's very difficult to get out information about problems with Steiner schools. It isn't... it is, it is, through him, because he doesn't want to do that. It's just nothing to do with skepticism, it's to do with his friends and his social grouping, and really it's not, it's not, what it's pretending to be, unfortunately.

M1 - ok

AG - you saw, you saw what we did. It's just we had to give him that letter personally because when we try and send it to him by email he refuses to acknowledge it. and it's a pre-defamation action protocol, that you have to do that. And I'm not going to go to his house because even us coming here, he's making comments to try and infer to everyone else that somehow we're dangerous, or something.

SP - or that we have something to do with his family.

AG - it was our children that were damaged by a Steiner school, not his, you know, and that's...

M1 - so you're from a position of... your children were bullied at a Steiner school

SP - one of them was.

AG - and the Steiner school's action when we tried to advocate, what he said is you've got to ask difficult questions,

M1 - yeah

AG - was expel them all.

M1 - ok. and so originally then, you were contacting Andy

AG - no, we were in contact with a friend of Andy's who decided, who had a personal thing about it, and decided to hate us, and therefore told Andy to hate us, and Andy did. he didn't even question it, he didn't ever speak to us, and his reaction, what you've just seen, is the reaction of a man who has no position.

W1 - were you on the comments? were you on andy's blog, on the comments, I saw the comments

SP - no, no. he deletes our comments

AG - he deletes our comments, he deletes anybody... any mention of us by anybody

SP - Even somebody else who mentioned our website, he deleted that.

W1 - but you also had a problem with Steiner schools, is that what you're saying?

SP - yes, that's right, yes

W1 - so why, why is he... I don't understand

SP - friendship

AG - because his friends told him that we're horrible people and to stay away from us, so he does.

SP - one of the people critical of Steiner that he talks to a lot who's in Sweden, said that what the Steiner school did to us was an elegant solution, that she admired the principal of the school

AG - to expel the children

SP - and yet she's supposedly critical of Steiner

AG - I don't believe... I mean I do believe Andy you know, I can see that he is concerned about these schools and everything, but this gap in actually, here's some people who you're actually slagging off to people, you know, who've been through this experience,

SP - it's a horrible [inaudible]

AG _ three and a half years it took us to get this action, and I don't think it's right that he should go around Britain saying it's very difficult to get into the media that Steiner schools aren't all fluffy, when he's got us sitting there who other people, we've been there,

SP - we're in the media...

AG - and he won't let us speak.

M1 - yeah

AG - not that he won't let us speak. He responded last time when we sent him a letter by publishing something about it on one of his little dungeon blogs which he's now moved up to his Quackometer blog, which said that basically that we seem to want to

SP - that we want to be the centre of the debate

AG about Steiner. well we're not people running up and down the country doing talks on Steiner with a little logo on

M1 - yeah.

AG - it's just not true, you know. so it's just rubbish,

W1 - so basically, what you're saying is he's saying that it's difficult to get information out there, you're saying you've done that.

SP - yeah, and he's hiding the information.

AG - he's hiding it

SP - he's saying that the newspapers are all fluffy about Steiner, we've been in the media, we've been on prime-time tv talking about it ,

AG - it wasn't in this country

SP- in New Zealand, so it's easy to hide.

AG - it doesn't matter because he's talking about France, he's talking about other schools, so the whole point...

Memorandum submitted by Dr Andrew Lewis (EV 39)

The Impact of Libel Laws on Bloggers

Introduction

1. The following case studies are examples of how current libel laws have personally affected me and my blogging activities.

2. My name is Andy Lewis and since 2006 I have been writing a regular blog at quackometer.net. The subject matter of my blog is an examination of superstitious and pseudoscientific health beliefs (often known as Complementary and Alternative Medicine), the potential harms that such beliefs can hold and the role of authorities and regulators in mitigating such potential harms.

Case 1: The Society of Homeopaths

3. In August 2007, I wrote a blog post entitled *The Gentle Art of Homeopathic Killing*.⁸⁰ The subject of the post was to examine the role of the Society of Homeopaths in regulating its members. A year before, the BBC Newsnight programme⁸¹ had investigated homeopaths in the UK who appeared to be offering dangerous advice to travellers to malarial areas. In particular, there was concern that it was routine for homeopaths to suggest homeopathic sugar pills could protect against serious travellers' conditions. Despite finding many examples, the Society of Homeopaths did not take any action against its members who were exposed by the programme.

4. I had concluded that despite the Society having a Code of Ethics that prevented its members from acting in certain ways, this code was never upheld and that homeopaths were free to practice as they saw fit. As such, such as code might give false assurance to the public that homeopaths were under appropriate scrutiny when they were not. In order to test this, I examined a particular member's claims and how they might be breaching the Society's Code of Ethics. The homeopath concerned was advertising that they could treat childhood asthma in the UK, and had been to Kenya to work at a clinic specializing in the homeopathic treatment of malaria, TB and HIV – activity that I suggested were likely to put lives at risk.

5. The first I knew that there was a problem with this post was on the 4th of October when I was contacted by my web hosts, Netcetera, alerting me that they had received a letter from the solicitors of the Society of Homeopaths (Howes Percival) requesting that they considered my post defamatory and that Netcetera should remove it. Netcetera say they have a policy of first asking the author to 'come to an agreement'.

6. I immediately wrote an email to Paula Ross, the then Chief Executive of the Society of Homeopaths, asking her to clarify the nature of their complaint and to explain why they viewed the article as defamatory. I wrote "If you could tell me urgently what the wording is that you feel is incorrect, defamatory or not fair comment

⁸⁰ <http://qako.me/tergentle>

⁸¹ <http://qako.me/kl01zD> "Malaria advice 'risks lives'", By Meirion Jones, BBC Newsnight

I will examine it immediately and will ensure a friendly and swift resolution of this matter.”⁸²

7. The Society did not reply to me. Instead, Howes Percival wrote to Netcetera again saying that the letter to ask for clarification was “inappropriate” and that all correspondence should go through “the firm”. I was included in the email and this was my first communication from the solicitors. At no point here or subsequently did the Society clarify the nature of its concerns or allow me any possibility to address them. The letter repeated the demand that the ‘material be removed’ and pointed out to Netcetera that *Godfrey vs Demon* showed that Netcetera would be liable for the material hosted on its sites. The threat was made that if the post was not removed by the 11th then ‘our client will have no option but to take immediate legal action against Netcetera and the Website’.

8. As neither I nor Netcetera were given any chance to address the concerns and, as the alternative was the suspension of my account by Netcetera, I had no option but to remove the material.

9. I was paying Netcetera £10 per month to host the Quackometer and various other sites I had constructed for friends and an elderly persons’ charity.

10. A number of people had heard about my predicament and as soon as they saw my post had been removed, found copies in the Google cache and reposted my article on their own web sites. Within a few days, over 64 copies had been reposted over the web after support from such people as Ben Goldacre from the Guardian⁸³ and the blog of Professor David Colquhoun FRS.⁸⁴

11. This support, whilst welcome, was also disconcerting as it was very unclear how such multiplication of any alleged libel would be viewed by the courts should the Society wish to pursue me.

12. As of today, the phrase “The Gentle Art of Homeopathic Killing” returns 20,900 hits on Google.

13. The Society of Homeopaths wrote to the Guardian after Goldacre’s article was printed. It is worth quoting the relevant parts as it is the only place where the thinking of the Society is explained:

The Society of Homeopaths took the content of the 2006 BBC Newsnight programme on malaria very seriously and responded via press statements and media interviews promising action if it were required. We contacted the programme makers directly to ask for their evidence that any Society members had given dangerous or misleading advice to members of the public. They were unable to provide a single example. The Society’s professional conduct procedures cannot be invoked without a specific complaint, an alleged offender or any evidence. In these circumstances, The Society was unable to investigate a specific case.

⁸² <http://qako.me/kcAlFb> Ben Goldacre’s Blog: Appendix: Andy’s incredibly polite email to the Society of Homeopaths

⁸³ <http://www.guardian.co.uk/science/2007/oct/20/homeopathy> Threats - the homeopathic panacea

⁸⁴ <http://www.dcsociety.net/?p=171> Society of Homeopaths: cowards and bullies

Nevertheless, as a further precaution, we reissued our Guidelines on advice for the prevention of malaria and sent a copy to every member within a day of the programme being aired.

The Society instructed lawyers to write to the Internet Service Provider of Dr. Lewis' website because the content of his site was not merely critical but defamatory of The Society, with the effect that its reputation could have been lowered. Dr Lewis, in his article, stated as fact highly offensive comments about The Society and it is for that reason that The Society decided it had no option but to take action. The very crude abuse posted on various websites and e-mailed to The Society since our action suggests that these bloggers/authors are not people who are interested in a real debate on the basis of either science or the public good but who simply want to attack homeopathy, for the very sake of it.

14. This episode came to an end when I obtained emails from the BBC Newsnight team that came from the Society of Homeopaths showing that the above statements were very misleading⁸⁵. The Society had acknowledged receipts of transcripts of the undercover conversations with their members, including a Fellow of the Society of Homeopaths. It was simply not true that the Society was unable to investigate any cases, and indeed in the Society of Homeopaths Newsletter (Winter 2007) they told their members that ‘the researchers identified three of our members’.

Case 2: Professor Joseph Chikelue Obi FRCAM

15. Joseph Obi, or as he prefers to style himself, Distinguished Provost of RCAM (Royal College of Alternative Medicine) Professor Joseph Chikelue Obi FRCAM(Dublin) FRIPH(UK) FACAM(USA) MICR(UK), used to be a doctor in the UK until he was struck off by the GMC after serious professional misconduct at South Tyneside District Hospital in 2003. He was alleged to have had inappropriate relationships with psychiatric patients, failed to care for patients, and was being investigated by the police for “taking thousands of pounds of a 58 year old woman”.⁸⁶

16. I wrote two blog posts in 2006 about how this was one of the most extreme examples of how people in Alternative Medicine use questionable titles and qualifications to enhance their credibility. Obi is a Professor of an organization that he invented – the Royal College of Alternative Medicine – which in reality is a post box in Dublin. Obi was selling ‘Fellowships’ of the College for many thousands to other people so they too could designate themselves with the letters FRCAM.

17. Once again, the first I knew there was a problem was when Obi sent an email to Netcetera. It contained the threat,

Further to our Previous Warnings , we wish to (once again) remind you that Quackometer.net (which you Host and Register) has still been flagrantly violating our Statutorily Registered Trademarks (and Copyright) - despite Multiple Warnings. Please therefore note that (unless you urgently remedy the

⁸⁵ <http://qako.me/tertruthmatters> The Society of Homeopaths: Truth Matters

⁸⁶ <http://qako.me/terDrObi> Shamed Doctor Probe – The Chronicle

situation) you will soon be liable to the Tune of US\$10,000,000 (Ten Million Dollars) per day ; effective the 21st of December 2009.

18. It was difficult to see this as anything other than a joke. Merely writing about a trademarked name does not constitute a violation of trademark or copyright. But a few weeks later, Netcetera received much more official looking letter from someone called Tanja Suessenbach,

Dear Sirs,

Re Defamation

We advise Professor Dr Obi and the Royal College of Alternative Medicine. We are informed that you host the Quackometer's website (copy evidence enclosed). Our clients hereby give you formal notice that they are determined to sue you directly for the highly defamatory contents contained on the website should you fail to immediately shut down the website and delete all of the defamatory material relating to the Royal College of Alternative Medicine, Professor Dr Obi and our clients' lawfully registered Trademarks.

In case the defamation continues beyond 12 noon on Monday the 21st of January 2008, we are instructed to hold you fully liable to the tune of £1 Million (One Million Pounds) per day , together with additional punitive damages relating to the many months during which the defamatory material had and has been globally accessible via your server.

Kindly note that Google has already blocked the highly defamatory material from appearing on its search engines in the Republic of Ireland, and is currently in the process of extending the ban to other countries.

Please find enclosed photocopies of the two RCAM Trademarks and a copy letter of Good Standing from the Company Registration Office in Ireland, as well as copies of these highly defamatory articles. Please provide an undertaking that no further reference concerning Professor Dr Obi and/or the Royal College of Alternative Medicine is going to appear anywhere within the Quackometer's website.

Looking forward to hearing from you.

Yours faithfully,

Tanja Suessenbach LLB, LLM

19. It was apparent that Obi had indeed managed to get Google Ireland to remove links to my site.

20. It was also clear that Suessenbach was not a solicitor, but a 'legal letter writer'.

21. I wrote to Suessenbach asking her to clarify the nature of the complaint. I received no response.

22. Netcetera, meanwhile, had been receiving threatening phone calls telling them that legal proceedings were about to begin and asking me to seek urgent resolution with Obi (which was impossible as no correspondence was being returned) or Netcetera would have no choice but to suspend my account.

23. It is worth noting Netcetera's view on their predicament:

We do not judge one way or the other as a company as to the veracity of content, although as individuals we have our own thoughts of course.

Unfortunately as far as the law is understandable, a request to take down a site for defamation requires us to do so unless we want to risk ending up in court defending something in which we as a company have no interest. Our policy at present is to pass on such requests to the site owner, and ask them to reconcile any differences with the complainant, perhaps taking off content in the meantime.

24. I took down the articles, but stated I would re-instate them if Obi and Suessenbach continued to refuse to engage with me.

25. Having received no response from Obi or Suessenbach, I reinstated my pages. On the 18th of January 2008, Netcetera suspended the Quackometer website stating I had breached their terms and conditions and citing my account had been "inappropriately used". The nature of this inappropriateness was not explained to me.

26. Within days, the Quackometer was back online, this time being hosted by Positive Internet. They wrote to me in an email entitled "Your lilly-livered Hosting Company" and offered to host my site for free.

27. One year later, in December 2009, Obi again threatened Positive Internet along similar lines stating that I was violating trademarks. Positive responded to me that "his legal theories sound about as rigorous as his medical ones." And that was the end of it.

Case 3: The Osteomyologist

28. In April 2008, I wrote about how the ASA had adjudicated⁸⁷ against an alternative health practitioner by the name of Robert Delgado at the Optimum Health Centres in North Finchley. My post was substantially about how statutory regulation of practitioners could be sidestepped by changing the name of what you do. Despite it being illegal to call yourself a chiropractor without being registered by the GCC, a

⁸⁷ <http://qako.me/ltxZDE> ASA Adjudication on Optimum Health Centres

number of practitioners sidestep this by calling themselves 'spinal therapists' or Osteomyologists.⁸⁸

29. Calling himself Dr Delgado, the Osteomyologist had been found by the ASA to be producing advertisements that lacked substantiation and truthfulness. They also found that in calling himself 'Dr' that this was likely to mislead the public into thinking he was a registered medical doctor.

30. Osteomyology is not a genuine medical speciality. It was a term coined in 1992 for chiropractors and osteopaths who refused to be regulated by the then new statutory regulatory framework. Changing the name of what they did removed them from the scope of legislation.⁸⁹ My post, entitled *Registered Osteomyologist, Robert Delgado, found Guilty by the ASA. So What?* highlighted that this left such practitioners with no regulatory framework to protect the public from them in the event of a problem. The ASA may have seen a problem, but they hold no sanction other than telling advertisers not to repeat their claims.

31. I received a letter from a solicitor acting for Delgado stating that they viewed my post as defamatory and that I should remove it immediately. In particular, they stated that as I had used the word 'guilty' in my title post that this could imply that Mr Delgado was criminally prosecuted.

32. I replied that I made it quite clear in my article that it was the ASA that had ruled on the complaint and that at no point do I suggest that criminal activity was involved. I asked for details of any other wording that Delgado thought were misleading untrue or inaccurate and that I would be happy to address them. And as a token of good faith that I would immediately change the title of my article to *Registered Osteomyologist, Robert Delgado, Gets Knuckles Rapped by the ASA. So What?*

33. The solicitor wrote back and failed to answer any of my questions asking for details of the words being complained of. Instead, the threat was repeated that unless the whole post was taken down, legal action would start for substantial damages.

34. After consideration, I felt I had no option but to comply. I felt satisfied to myself that my article was factual and honest opinion, but I had no confidence in how courts would interpret words like 'guilty'. As the amount of money involved could soon get very high, I felt I had no option but to remove the post.

Conclusions

35. In reforming libel law, I will be looking for changes that allow me to feel confident that an honest, public discussion of controversial areas where there are potential vested interests involved need not expose me to arbitrary legal threats that could financially ruin me. The health of democracy requires ordinary citizens to be able to participate in public debate without fear of capricious and crippling harms.

⁸⁸ <http://qako.me/jK2HsO> The Times: Back off: Handle with care

⁸⁹ <http://en.wikipedia.org/wiki/Osteomyology>

ISPs and their role in Libel

36. Current interpretation of libel law makes ISPs an easy target and weak link that can easily be attacked should someone wish to remove critical material from the web.

37. ISPs are typically paid a few pounds per month by bloggers and have no incentive to defend their users against claims that might mount to hundreds of thousands of pounds. Even trivial claims might start amounting significant costs should a complainant start legal action.

38. ISPs are treated as if they are publishers of materials rather than being the infrastructure on which the web works. There is no clear hierarchy of responsibility in the digital publishing world. It should not be possible to threaten an ISP unless all reasonable effort has been made in resolving the matter with authors and editors of materials.

39. Requests to ISPs to remove material should be a last resort and the management of an ISP needs to be confident that the request is genuine and has complied with reasonable steps with the author or site owner. Doubt in an ISPs liability will ensure that an ISP will always act to minimise its exposure to risk at the expense of the publisher of the material.

Nature of Libel

40. At present, libel laws are being used simply to remove unfavourable material from the web. The costs involved with defending a claim mean that it is irrational to maintain resistance in the face of such a threat for most people.

41. Those who seek to use libel law should be required to show that significant and serious damage has occurred. However, given that a individual is usually unable to start to defend against a threat given even a small chance of chance of significant losses, the law should be clear that a solicitor cannot act unless they are confident that the claim is not trivial and that comprehensive details of the exact nature of the offending words and the nature of the harm is clearly offered.

42. A blogger should be able to feel confident that a trial cannot proceed unless the complainant has undertaken appropriate pre-trial protocols in attempt to resolve the dispute before a trial can start. This would help to remove the Damoclesian threat that is at the centre of the chilling effect of current libel law. Such a protocol would ensure that there is a duty to contact the authors of the material in preference to any other party that may be involved in the chain of publication, that the nature of the complaint is made clear and that simple and fast remedies are offered that do not involve attempts to silence beyond the scope of the complaint.

43. Authors should be able to feel confident that they have a right to fair comment regarding matters such as public safety, public health, science, policy and politics. The free expression of debate regarding public interest should weigh substantially against any particular reputation, especially if that is a commercial reputation.

44. Authors should also be able to feel confident that arbitrary definitions or usages of words cannot detract from comment that is substantially true.

June 2011

Dr Andrew Lewis
Hazelwood Cottage
Gurney Slade
Radstock BA3 4TQ

Thursday, 2nd of May 2013

Dear Andy

We wrote to you some months ago attempting to persuade you to address the defamatory comments you have made about us and suggesting that you may have made these actions against us due to misinformation regarding ourselves that you had received from third parties. Your answer was to publish a response to the effect that you would respond to any legal representative of ours by telling them to fuck off.

Therefore, in line with the pre-action protocol for defamation we are again respectfully asking you to please either substantiate your allegations about us or publicly withdraw them.

Our letter requesting your attention to the libellous material you have written was published online by you on Posterous in November 2012 - lecanardnoir.posterous.com/angel-garden-and-steve-paris - and republished just a few days ago (according to two tweets you posted on the 28th of April), on your blog - www.quackometer.net/blog/2012/11/angel-garden-and-steve-paris.html.

The defamation includes unsubstantiated personal allegations against us in tweets stating that we have malice in our hearts, have told terrible lies about Melanie Byng, have tried to lose friends their jobs, as detailed in our last appeal to you to try and sort this out amicably.

There is plenty of evidence that you have spread these types of unsubstantiated allegations around, and the evidence is supported also by the fact that people regularly block us for no apparent reason often publishing tweets saying things like "Andy was right about you", while you go from city to city professing to be giving all the relevant information parents need on Steiner - i.e. attempting to occupy the centre of the debate, which you surmised in your posterous post that we "appear" to be trying to do.

These personal defamatory comments are not only unlawful and clearly designed to damage our reputation, but such prejudicial statements about parents coming out of nasty situations in Steiner education are also clearly at odds with your claimed views about Steiner schools, including the many statements you make that people who put forward the views of those you term "quacks" are actually using "false balance" (in fact you have republished what you said in November *after* the school has signed legally binding statements that corroborated our version of events).

It seems incredible that these two positions could be held by the same person, and we note that such inconsistency appears to be one of the things that amazes you yourself about adherents of Steiner for example that may love anthroposophy whilst acknowledging that their relatives have been killed by homeopathy.

The stress of undertaking such an action as we have with any institution is obviously substantial as we note that you acknowledge in regard to others attempting to hold dissembling institutions to account.

Yet any knock-on effect on our own children of your collusion with the attempts of friends of yours to undermine our actions appears not to register with you - in spite of the fact that we have tried to inform you about it and that you have been and continue to be traveling all over the country expressing your concern for children due to Steiner education.

Instead you appear to happily express these two incompatible points of view, i.e. that Steiner schools generally are less than honest, but that the Titirangi Rudolf Steiner School, which has now made several important and legally binding admissions about their failure to deal with bullying, and which also happens to be the National HQ for NZ Steiner schools, may have been justified in expelling the children of parents attempting to address the unchecked bullying, which you yourself refer to in your treatment of Steiner.

It certainly points to your particular position on this situation, including your outright defamation of us, being simply because of your personal group allegiances and not because the arguments or points of view hold any merit in themselves as evidenced by the fact that you do not appear to have made a single effort to find out the truth before making such damaging statements to third parties about people you do not personally know at all. As noted above, even your rude response to our earlier polite request for retraction and resolution, which acknowledged that you may have simply been misled, was published.

Therefore we suggest, for the last time, that you agree to discuss with us how to undo and rectify this nasty situation, and suggest that you are well-placed to allow the facts concerning parents who have succeeded in publicly holding a Steiner school to account over unchecked bullying to be part of the information that any parents considering such an education for their own children might "need to know".

Andy, please think about this. We are returning to the UK where we will be much better able to address the issues with you. Whatever the Byng's reasons for introducing initiatives that they couldn't see through, or take responsibility for, it is exceptionally easy to prove that it happened, and that all these offers made were because my mum was dying - perhaps they just didn't realise how stressful that might be.... Although that obviously sounds impossible, especially considering that Richard Byng is a Senior mental health lecturer, we were and are always prepared to seek resolution.

What we're certainly not prepared to do is to let that mistake of the Byngs' ruin our own reputation, through malicious untruths *or* to deprive people of knowledge of a Human Rights settlement by a Steiner school over bullying any further.

We therefore give you fair notice that having asked you several times to be reasonable and honest in this matter, we will make every effort at our disposal to get you to address the untruthful way you are treating us, while you yourself are demonstrably seeking to dominate the moral high-ground in public debate on Steiner.

Andy, you're a savvy bloke, and a canny wordsmith. Let's sort this matter out now through diplomacy before we are forced, to protect our reputations, to take actions that will make that option unavailable.

We believe, however difficult it may seem given the entrenched views of some of your acquaintances, that you are up to this job, and we do mean that sincerely, as well as being aware that protocol demands that we make every effort to try and persuade you to willingly retract your unsubstantiated defamatory allegations against us and settle this matter in order to avoid possible legal action.

Should you choose to engage, you will find us ready and willing to negotiate a way out of any further hostility, and this would be our preferred avenue, especially given the struggle we've just finished with the school, with its effects on our family, as well as the necessity to come back to the UK, all of which is highly stressful.

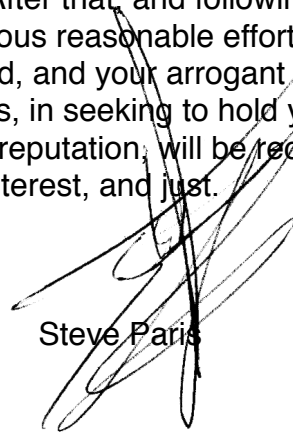
Please respond to this letter by email, by the 8th of May. After that, and following this final plea for reasonableness and honesty, and given our previous reasonable efforts to settle this matter amicably, even to allow that you've been misled, and your arrogant response to those efforts, we hope that any subsequent actions of ours, in seeking to hold you accountable for attempting to undermine and defame our reputation, will be recognised by the relevant authorities as inevitable, firmly in the public interest, and just.

Yours sincerely

Angel Garden

A handwritten signature in cursive script that reads "Angel Garden".

Steve Paris

A handwritten signature in cursive script that reads "Steve Paris".



Andy Lewis <andy.scali.lewis@gmail.com>

SITP

3 messages

Jo Torres

16 July 2013 10:30

To: "andy.scali.lewis@gmail.com" <andy.scali.lewis@gmail.com>

Hi Andy!

Really looking forward to tonight, is there anything you need me to bring like a laptop? If so could you send me an attachment with any presentations so I can make sure my laptop isn't going to have a hissy fit about it?! Projector, mic etc are all sorted anyway.

What time are you getting into Plymouth? Are you driving or training, if training let me know when you get in and I'll come meet you at the station!

Cheers me dear, see you soon!

Jo

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Andy Lewis <andy@scali-lewis.net>

16 July 2013 10:58

To: Jo Torres

Hi Jo

I have all I need - so see you there. Will be driving.

By the way, not sure if you were aware, but my Bath talk was disrupted by Angel Garden and Steve Paris. They have been harassing me for over a year and are as mad as cheese. I thought they lived in new zealand but showed up in Bath to 'serve papers on me'. Idiots. But. They may show up in Plymouth. They are now living in Bristol. Wanted to warn you. I do not want them allowed admittance and will not speak if they are there. Their behaviour is quite disturbing and they may try to film or record or disrupt in some way. I hope you understand.

Regards

Andy

[Quoted text hidden]

Jo Torres

16 July 2013 11:32

To: Andy Lewis <andy@scali-lewis.net>

Hi Andy,

That's fab I'll see you there! I've been extensively briefed on Angel and Steve via Melanie, I'll do my best, but I don't know them so it might be a case of pointing them out if they show up and I can ask them to leave. You know the venue, so there's a good chance there will be people there just eating, hope you get what I mean. If it's any reassurance, Mike, my other half, was a bouncer for years so is well versed in efficient removal of crazies.

What were they serving you papers with/for? Mental...

Anyway, really looking forward to this evening, not sure if I mentioned we don't start proceedings until at least 7.30pm these days, less of a rush! See you later,



Search Twitter

**Andy Lewis**

@lecanardnoir



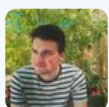
Follow

@tswyatt The important thing to grasp is that they are part of an esoteric cult. What they say to the public differs from internal beliefs.

Reply Retweet Favorite More

1:17 PM - 14 Jun 2013

Reply to @lecanardnoir @tswyatt

**Tim Wyatt** @tswyatt · 14 Jun 2013

@lecanardnoir Well we would need documentary evidence of that being the case for our local Steiners before we could print it obviously.

Details

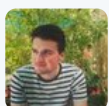
Reply Retweet Favorite More

**Andy Lewis** @lecanardnoir · 14 Jun 2013

@tswyatt And that is how they will get away with it. No one will call them out. It requires too much work to expose them!

Details

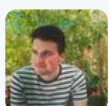
Reply Retweet Favorite More

**Tim Wyatt** @tswyatt · 14 Jun 2013

@lecanardnoir See it from our perspective for a second. Very under-staffed and busy local newspaper. Hard to do long-term investigation.

Details

Reply Retweet Favorite More

**Tim Wyatt** @tswyatt · 14 Jun 2013











@lecanardnoir If a local Steiner school could be proven to be discouraging vaccination I would love nothing more than to expose it.

Details

Reply Retweet Favorite More

**Andy Lewis** @lecanardnoir · 14 Jun 2013

@tswyatt I know. I know. But that does not mean you can print misleading articles with people getting upset.

Details		Reply	Retweet	Favorite	More
	Tim Wyatt @tswyatt · 14 Jun 2013 @lecanardnoir I see your point. If I was writing it I hope I would have dug around online a bit more to present a range of views.	Details	Reply	Retweet	Favorite More
	Tim Wyatt @tswyatt · 14 Jun 2013 @lecanardnoir Ultimately, If Steiners are that bad, your beef should be with Ofsted and DfE who are happily approving them.	Details	Reply	Retweet	Favorite More
	Tim Wyatt @tswyatt · 14 Jun 2013 @lecanardnoir Or maybe find a newspaper that isn't hemorrhaging money and can afford to pay its reporters to investigate haha ;)	Details	Reply	Retweet	Favorite More
	Andy Lewis @lecanardnoir · 14 Jun 2013 @tswyatt Great! But very hard to do. A sting would be the only option.	Details	Reply	Retweet	Favorite More
	Andy Lewis @lecanardnoir · 14 Jun 2013 @tswyatt Bed time reading. Ex Steiner Teacher whistleblows: won a court action trying to silence him a few weeks back qako.me/13Vcec8	Details	Reply	Retweet	Favorite More
	Tim Wyatt @tswyatt · 14 Jun 2013 @lecanardnoir Probably. Sadly PCC rules mean you can't do a speculative secret recording etc. Must already have some evidence of wrongdoing.	Details	Reply	Retweet	Favorite More
	Andy Lewis @lecanardnoir · 14 Jun 2013 @tswyatt You will get your evidence when the new school is riddled with measles!	Details	Reply	Retweet	Favorite More
	Tim Wyatt @tswyatt · 14 Jun 2013 @lecanardnoir Well let's hope not but if they are it would be great to expose it and hold them to account.	Details	Reply	Retweet	Favorite More
	Tim Wyatt @tswyatt · 14 Jun 2013 @lecanardnoir Must get back to work but will read up later. Thanks.	Details	Reply	Retweet	Favorite More
	Steve Paris @sjparis · 14 Jun 2013 @tswyatt u want documentary evidence? Steiner school says they offer "safe,				

natural, peaceful haven" yet one expelled kids 4 being bullied.

Details

 Reply  Delete  Favorite  More



Steve Paris @sjparis · 14 Jun 2013

@tswyatt interesting what Andy says re too much work to expose Steiner schools: we did it, he knows it, but doesn't tell others about it.

Details

 Reply  Delete  Favorite  More



Steve Paris @sjparis · 14 Jun 2013

@tswyatt sadly u won't find that: they neither encourage nor disprove. It's all down to the parents

Details

 Reply  Delete  Favorite  More



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Ben Butler jailed for murdering daughter Ellie after custody battle

🕒 21 June 2016 | [London](#)

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Ben Butler had a conviction for shaking Ellie when she was a baby quashed

A father who murdered his six-year-old daughter just 11 months after she was returned to his care following a custody battle has been jailed.

Ben Butler, 36, inflicted catastrophic head injuries upon Ellie while looking after her at their home in Sutton, south-west London, in October 2013.

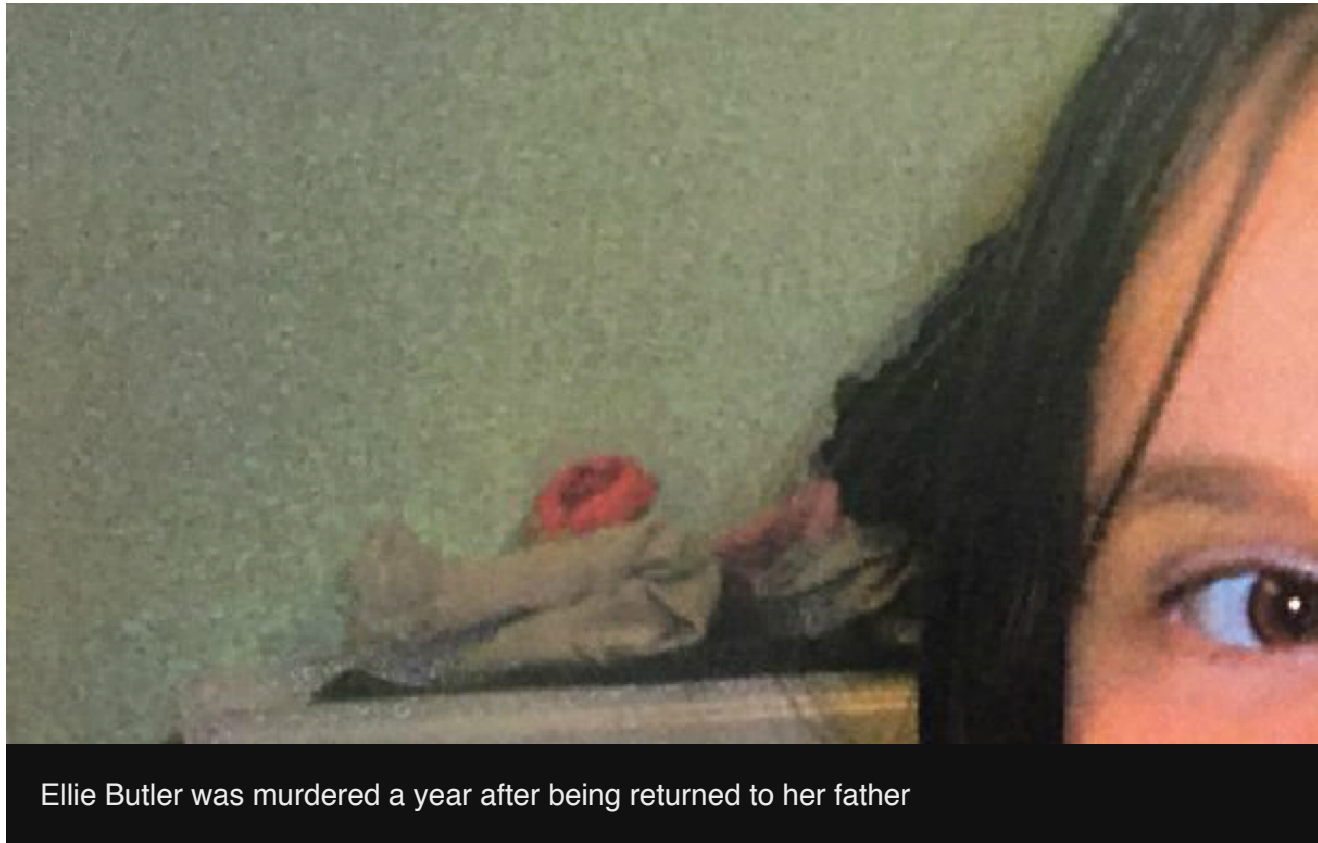
He was also found guilty of child cruelty over a shoulder injury, as was Ellie's mother Jennie Gray.

He was jailed for a minimum of 23 years. Gray was jailed for 42 months.

Gray, a graphic designer, had admitted perverting the course of justice.

The exonerated father who went on to kill

More on this story on BBC London Live



Ellie Butler was murdered a year after being returned to her father

Following the guilty verdict at the Old Bailey, Butler shouted out: "I'll fight for the rest of my life - unbelievable," before adding: "I want to be sentenced now so I can fight in the Appeal Court."

He added: "I will fight forever to prove this wrong. My daughter was jumping in the house. I'm 100% not guilty."

Gray said: "Big mistake. Spend another 10 years proving you wrong."



quashed on appeal.

The couple then won a High Court judgement to have Ellie returned to their care in 2012.

Mrs Justice Hogg had sided with Butler despite objections from police, social services and Ellie's maternal grandfather, Neal Gray.

At the time, Mr Gray - who had cared for Ellie since she was a baby - had allegedly warned the judge she would have "blood on your hands".

A **serious case review** found Sutton Children Services felt "powerless to act" following the High Court's ruling.

It found Mrs Justice Hogg's ruling in the Family Court went much further than simply quashing Butler's previous conviction and had exonerated him, as, in her eyes, he was a victim of a miscarriage of justice.

That had the effect of telling social services to "back off" - despite social workers' concerns about returning Ellie to her parents, the review concluded.

A spokesman for the Judiciary said: "If a judge errs in law or on the facts, the remedy is to appeal."

To refer a judge's decision to an extra-judicial body would be incompatible with the principle of judicial independence."

Alex Clark, headteacher of Avenue Primary Academy in Sutton which Ellie attended for 10 months before she died, said school staff had concerns about the family and had offered the parents help which they did not accept.

He said Butler and Gray would not meet teachers to discuss why Ellie had missed periods from school.

"Generally, they were very difficult to work with. When we asked questions they sometimes became angry and defensive and on two occasions Jennie Gray made reference to her solicitor.

'Infantile and sentimentalised fantasy'

In sentencing Butler, Judge Mr Justice Wilkie told him: "You are a self-absorbed, ill-tempered, violent and domineering man who... regarded your children and your partner as trophies, having no role other than to fit in with your infantile and sentimentalised fantasy of family life with you as the patriarch whose every whim was to be responded to."



Ellie Butler had been living with grandparents before she was returned to Butler and Gray

Jurors were told Butler battered his daughter to death in a volcanic loss of temper.

He did not call 999 for two hours and instead called Jennie Gray back from work in the City of London.

They then concocted an elaborate plot to destroy evidence and stage the scene of an accidental fall before alerting the ambulance service.

'Grotesque charade'

The couple even involved Ellie's younger sibling by sending the child into a room on the pretext of fetching Ellie for cake, jurors were told.

The child can be heard on the 999 call saying Ellie "won't wake up".

Mr Justice Wilkie told a sobbing Gray that she may have been "exceptionally naive and stupid" to believe Butler and take part in the cover-up.

He added: "You played your full part in the grotesque charade that was the 999 call whilst subjecting your dead daughter to the indignity of pointless CPR when you knew full well she had been dead for two hours."



Ellie's grandmother Linda Gray died on 19 April - the first day of the murder trial - but the news was kept from Jennie Gray until sentencing at her father's request.

In a joint statement, written ahead of the trial, Ellie's grandparents said they had struggled to come to terms with the "shock and horror" of her death.

"Ellie was a very beautiful, bubbly and intelligent little girl who always had a smile on her face and even at such a young age she was nobody's fool. She was our life and she gave so much pleasure to us and our family too. How we all miss her."

Without referring directly to their daughter or Butler throughout the statement, they said: "We did not realise that some people could be so wicked."



Gray had admitted perverting the course of justice



MET POLICE

The couple had tried to cover up the death by lying to police

The court heard harrowing evidence of a toxic family life dominated by a man described in court as "angry, overbearing and manipulative".

Butler had a "volatile temper" which could "explode at any time".

In the months leading up to Ellie's death he sent hundreds of abusive and threatening texts to Gray containing the most obscene and vile language, often directed at Ellie and a younger sibling.

Jurors heard how he frequently beat Gray up and threw her out onto the streets.

A video clip played in court also showed him swearing aggressively on a phone call in the family kitchen in front of Ellie.



Malcolm McHaffie, deputy chief crown prosecutor for CPS London, said: "Ellie Butler was murdered in her home, where she should have felt safe, by her violent father who should have loved and protected her.

"We may never know exactly what happened in the last few hours of Ellie's life, but the CPS built a strong case to show that her death was the result of deliberate violence by Butler."

Timeline

- February 2007: At six weeks old and in the sole care of her father, Ellie was found to be "suddenly soft and limp". Scans showed she had serious injuries.
- June 2007: Ellie was placed in the care of her grandparents.
- January 2008: The Family Court found that, on the balance of probability, Butler caused Ellie's injuries and Gray failed to protect her.
- March 2009: Butler was convicted of grievous bodily harm and sentenced to 18 months in prison. He had a history of offending and violence.
- June 2010: His criminal conviction was quashed by the Court of Appeal on the basis of new medical evidence.
- July 2012: The Family Court overturned an order which protected Ellie from her parents. It exonerated Butler and said that any injury caused to Ellie was "purely accidental".
- An independent social work agency was appointed to replace Sutton Council's social workers to oversee the children being returned to their parents.
- The children were not subject to any court orders which had an effect of preventing agencies (social workers, child protection, schools etc) from having any further involvement.
- November 2012: Ellie was returned to her parents' care.
- October 2013: Ellie was murdered.

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Ben Butler: The exonerated father who went on to kill

21 June 2016

Claim No: 3SA90091

IN THE HIGH COURT OF JUSTICE

QUEEN' S BENCH DIVISION

SWANSEA DISTRICT REGISTRY

BETWEEN:

MR STEPHANE (AKA STEVE) PARIS

MS ANGEL GARDEN

Claimants

-and-

DR ANDREW LEWIS

MRS MELANIE BYNG

Defendants

Witness Statements and attachments in support of Application to re-amend the Particulars of Claim.

Index

- page 2 - Witness statement
- page 7 - Original claims under the PHA
- page 11 - Sample evidence from the Defendants' Disclosures

This is a Witness Statement in support of the application by Claimants Stephane Paris and Angel Garden, writers and film-makers of 9 Long Bryngwyn, Sketty, Swansea SA2 0TX, in support of our Application to re-amend the Particulars.

We make this witness statement as follows.

1. The original PoC contained two claims under the PHA against both the Defendants and Professor Byng who is now out of the case due to lack of concrete evidence against him at the time.
2. On bringing the claim, and due to the deliberately covert and proxy nature of this harassment, the concrete evidence of it, as distinct from the Claimants own accurate published accounts, was not visible when the case was started, and on seeking representation we received advice to amend those claims due to the lack of concrete evidence, in spite of our wishes.
3. Nevertheless the Defendants themselves knew full well of their own course of conduct when they threatened Strike-Outs and then took large sums off the Claimants to amend those claims solely due to the lack of concrete evidence and which wouldn't have been the case were it not for the covert nature of the harassment. This includes thousands paid to the 2nd Defendant's husband, a mental health professor, in spite of him turning out to be the origin of the ongoing and widely circulated mental health smears which originated in his fake "clinical diagnosis" of "borderline personality disorder" of the second Claimant who met him once, when facing the imminent and sudden death of my mother, and who has never consulted with him. This lie was fabricated to obfuscate the true origin of the 2nd Defendant's targeting of the

Claimants as detailed in the original POC. **(Appendix A)**

4. Disclosure shows this mental health smear has been widely spread about in various ways to undermine the integrity of the Claimants family and every aspect of their lives:
(Appendix B)

5. These harassment claims were brought after the Claimants and their family had been subjected to a years long course of conduct of open, covert and proxy harassment by both defamation and concealment, covert misrepresentations, including mental health smearing and the imputation of dangerous criminality as well as disability abuse and privacy invasions and substantial stalking as revealed in the disclosure, and evidenced herein **in all the Appendices**, which are here cross referenced also with the original claims under the PHA.

6. All this was organised to remove the Claimants from a supposedly democratic platform of shared interests in children's wellbeing **(Appendix C, E)** and to sabotage, degrade and ultimately conceal entirely the Claimants' family's landmark Human Rights settlement, by publicly misrepresenting it without right of reply, as being of no consequence, or, as the 1st Defendant, not acknowledge its existence at all, as in the blog post complained of in Paragraph 6 of the Amended POC, and covertly putting it about that the claimants themselves were dangerous weirdos in order to justify their exclusion from any democratic participation **(Appendix F)**

7. The Claimants were out of UK jurisdiction for much of this period, being in New Zealand, and so could address neither the harassment nor the defamation except by

entreaty and publication, apart from by relocating their family to this country. While the only motivation publicly allowed to the Claimants for their objection to degrading treatment by the Defendants was "harassment", **(Appendix G)** the disclosure shows 2nd Defendant particularly was particularly aware that her course of conduct was facilitated by the claimants' absence from jurisdiction. **(Appendix H)**

8. By relocating, and having brought this case, the Defendants' disclosure has proven the case of harassment in the original POC, and in fact the disclosures have surpassed the Claimants' accurate published accounts, revealing a far-reaching campaign of stalking and harassment fomented by the Defendants and provably also now stretching way beyond them through their networks into press agencies and organisations including the BBC, The Guardian, and the British Humanist Association.

(Appendix I)

9. The disclosures are also replete with further defamation, which moreover has been circulated far and wide according to the disclosures **(Appendix B, C)**, and there is far too much wide defamation to contemplate the expense and stress of bringing them as Heads of Claim in Defamation and the disclosure demonstrates how the defamation itself is a tactic that is part of the extensive harassment in this case as there is no right of reply to deliberate misrepresentations and both Defendants' disclosures show that far from being concerned or bothered about the Claimants distressed publications about the harassment, mobbing, and gang stalking they were subjected to, as claimed in the Defence, the Defendants found it funny and enjoyed provoking the Claimants. **(Appendix D)**

10. Following Disclosure, and before we had had a chance to recover from the impact of learning of the true extent of such concerted and intense gang stalking behaviour, the Defendants immediately suggested mediation in the middle of October 2014 and, settlement negotiations having very recently eventually failed, this Hearing is the first chance the Claimants have had to address the matter as since then we have been sincerely trying to settle.
11. Paragraph 21 of the amended particulars of claim States that "unless restrained, the Defendants and each of them will further publish or cause to be published the words complained of or similar words defamatory of the claimants" and this has been proven even during the last several weeks as we are blocked defamed and mobbed continually with the Defendants' hands clearly visible at work, both in the immediate deletion of our information, followed by blocking by a third party when the 2nd Defendant was included in a tweet with us by that party concerning shared interests, and in the recent public mauling of the 2nd claimant by another third party on a totally unconnected platform using intimidating claims to have met and spoken to her, to justify his allegations of harassment and of being a stalker online and "irl" (in real life), which is how the act of paying to attend a public meeting has been characterised by the Defendants. The mental health smearing that the same third party has previously specifically been attributed to the "evidence-based skeptic" 1st Defendant, which was also in the original particulars of claim **(Appendix K)**
12. These incidents cited above are recent, and ongoing, and it hardly seems as if the Defendants need to do much any more themselves as **"Everyone who needed to**

know has been informed"" (Appendix C), according to the 2nd Defendant.

13. We therefore re-submit these claims, and ask for the order that the PoC may be re-amended to re-include them.
14. We also request that the confidentiality on the significant gang-stalking, and proxy and covert harassment in the Defendants' disclosures be waived.
15. Noting the costs order that was made on the Defendants' behalf on amendment of the claims, we also therefore request an alternative costs order that the Defendants themselves should bear the costs of this re-amendment, or the costs be in the case, or parties bear their own costs, for otherwise we would be asked to pay twice, entirely due to the covert and proxy nature of the harassment. As it has already been claimed that very large sums had been spent examining the claims, due to the "professional" status of these Defendants occasioning a substantial and immediate costs order, then if that was true at that time, the work on these harassment claims has already been done.
16. If that is true, why wasn't the fact that this professionalism had in fact been used to dishonestly pass someone off as mentally ill, been discovered and dealt with properly then?
17. Although we will bring a draft order to the hearing, as LIPs, we would appreciate the judge's help in ensuring it's suitability and compliance.

CLAIMS UNDER THE PROTECTION FROM HARASSMENT ACT 1997 FROM THE ORIGINAL POC, HERE CROSS REFERENCED WITH THE EVIDENCE FROM THE DISCLOSURE

36. The First Claim under the PHA to only the 2nd and 3rd Defendants [professor Byng has been removed]

- a) That the 2nd Defendant has followed a course of conduct by their actions and inactions over a long period of time, which amount to harassment by:
 - i) attempting to conceal her fraudulent misrepresentations to the Claimants
(APPENDIX A)
 - ii) refusing to address any results of those misrepresentations, while making further covert misrepresentations about those circumstances instead, **(APPENDIX A,B)** and overtly publicly smearing the mental health of the Claimants, as well as vituperating, threatening and shunning them, including on shared interests and encouraging others to do so **(APPENDIX B, C)** while simultaneously seeking a platform for themselves including in the National Press on the subject of the shared interests with the Claimants **(APPENDIX E)** and on the basis of the 3rd Defendant's position as a Senior Mental Health Lecturer and that their actions and inactions comprise a course of conduct that they knew, or ought to have known would cause extreme anxiety, distress, alarm and mental and emotional anguish to the Claimants and as such amounts to substantial harassment of both the Claimants and their children under Section 3 of the Act.

[b) loss and damage]

37. Second Claim under the PHA 1997 to only the 1st Defendant

- a) In his continual course of interfering with the established legitimate interests and agency of the Claimants with regard to unchecked bullying in Steiner, and instead deliberately fomenting the personal campaign which he knew had its roots in his friends' desire to hide the fact of their misrepresentations **(Appendix C)** including by at all times
 - i) Framing any and all expressions of protest, distress and anxiety by the Claimants, whether general or to individuals, as personal harassment of himself, of the 1st Defendant, and of other skeptics, and having so framed it, then using their clearly expressed distress as his justification for course of conduct towards the Claimants. **(APPENDIX F)**
 - ii) openly preferring and encouraging others to prefer people and sites harassing and defaming the Claimants, including the 2nd Defendant. (APPENDIX C **APPENDIX F** covert and proxy harassment)
 - iii) blocking the claimants from any democratic participation while continuing to advertise a "good spirit of debate", on his Quackometer Blog or anywhere else, no matter how relevant their input might be to the subject, whilst seeking a newsworthy platform for himself under his labels **(APPENDIX J)**

- iv) inciting organisations to ban the Claimants from attending supposedly public meetings by himself threatening not to attend if they are allowed in, and framing all their attempts to follow pre- action protocol to try and resolve matters as a personal “threat”. **(APPENDIX F)**
- v) deliberately publishing rumour and hearsay, but not the facts of the matter, which he could reasonably be expected to know.
- vi) covertly threatening to block and blocking others from mentioning the Claimants’ case or their success, in a “good spirit of debate” and representing any such attempt to inform about their agency as “sock/meat puppetry”,
- vii) counselling the Claimants to publish on their own platforms, and then continually framing all instances of them doing so as personal harassment and stalking of himself. **(Appendix F - DELIBERATE provocation)**
- viii) refusing to submit the issues to any fair and impartial examination whatsoever, **(Appendix F)** or to publish facts and ignoring all pleas for resolution, including offers to mediate, but continually and contemptuously provoking the Claimants towards legal action before he will publish any verifiable facts about the settlement, **(Appendix D)** including the fact that, due to the reasonableness of the Claimants, and the willingness of themselves and their children to settle matters with the Steiner School without pushing towards legal action, they may not now prove the discrimination through the Human Rights Tribunal, in spite of his harassment and devaluation of the practical agency they have achieved, the 1st Defendant has followed a course of conduct towards the Claimants, that he knew or should have known would cause the Claimants distress, anxiety, alarm and mental anguish and could reasonably be foreseen to interfere with the Claimants’ including their

children's, legitimate interest in promoting agency for unchecked bullying in Steiner Education.

[b) loss and damage]

APPENDICES

Appendix A

Tab 184 - 28.1.2013 - 2nd defendant: "her 'disability' is annoying but not that bad - in fact she told me she had to ham it up to get her disability parking permit"

Tab 104 -29.3.2012 - the 2nd defendant: "She can't mention me because I haven't written anything she can point to"

Tab 112 - 8.5.2012 - 2nd defendant: "Joe says she's not walking impaired, she's just fat."

Tab 35 - 22.9.2011 2nd defendant: "let's assume that the mother is real"

Tab 206 - 6.7.2013 2nd defendant: "All because a 17 yr old boy didn't want to be used as a scivvy."

Tab 28 - 30.8.2011 The 2nd Defendant: "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. [...] I did not breathe until I knew my child was on that plane, I was so scared they'd do something else. It's hard to forget that sensation. [...] I cannot get over what they expected from him, as if he were some kind of servant. [...] Just before he left he was on Skype (from his room on his computer) telling me they'd said Steve would take him to the airport if he cleaned their house - imagine - if he cleaned their house. Dear Dog. "

Tab 30 - 3.9.2011 The 2nd Defendant: "Even his [the 1st Claimant's] parents won't speak to either of them anymore, so upset are they about what's happening to the children. [...]"

He [the 1st Claimant] must think if only Thetis [the 2nd Defendant] would make an appearance, or the events in France are mentioned he can defend himself and suggest I'm over-reacting, and that since I haven't answered any of their emails I clearly would rather wreck their project than discuss it sensibly and that this would be the right 'etiquette'. [...] But I don't care about them enough to answer their emails. I blocked her the minute I knew Joe was on the plane home. I unfollowed because they tried to direct message me. I don't ever want to talk to them again. Not because what they did was terrible, though it was pretty shitty, but because they're entirely untrustworthy and mendacious and manipulative and above all, selfish."

Tab 31 - 4.9.2011 The 2nd Defendant: "Her emails go straight into my trash, I have no intention of reading anything."

Tab 75 - 31.1.2012 the 2nd defendant: " At the airport, Steve fleeced Joe for all the money he had on him."

Tab 75 - 31.1.2012 the 2nd defendant: "because she was making it very clear that she expects ex-Steiner parents to use their own identities to 'whistle-blow' re bad experiences at Steiner schools. If not, she feels pressure should be brought to bear on these families to 'come clean'. "

Tab 75 - 31.1.2012 the 2nd defendant: "Angel even accuses me of 'grooming' her daughter (who I didn't even meet) presumably because I suggested Sands as a possibility and then withdrew my support."

Appendix B

Tab 85 - 19.2.2012 - 2nd defendant "In fact I'd love to hear she's been run over by a train, or that an elephant had fallen out of a tree onto her head (it would have to be something large) or that a tribe of Patagonian Indians had whittled her skull into a canoe. Vile loon."

Tab 131 - 9.6.2012 - 2nd defendant "I am happy to give her a hole in the head anytime"

Tab 47 - 13.10.2011 - The 2nd Defendant: "Both are paranoid but she is delusional. [...]
At the end of this is his [The 2nd Defendant's husband] clinical judgement, which she seems to have forgotten.

Tab 47 - 14.10.2011 - the 2nd defendant - "I have a few ideas which kept R [the 2nd defendant's husband] and I laughing last night. Including the idea that HE should have spotted that she has a flaming borderline personality disorder, and was deficient in not spotting this at the first mention of her name."

Tab 47 - 14.10.2011 - The 2nd Defendant : "borderline - they threaten suicide too, and she may have threatened other things, which is why Steve may not want to risk leaving the children with her if he's ever thought of escaping."

Tab 48 - 12.10.2011 - 2nd Defendant (to Allan Beavis) "She is clearly mad."

Tab 58 - 5.11.2011 - the 2nd defendant: "he has to support her. Otherwise he would lose his children. If the diagnosis is accurate she might even have made threats to hurt them. Or herself. Or him."

Tab 69 - 12.1.2012 - the 2nd Defendant (to Sam): "Angel has a borderline personality disorder. This is a clinical judgement, not a personal opinion."

Tab 75 - 31.1.2012 - the 2nd Defendant (to the 1st Defendant): "While Joe was away my husband 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 80 - 13.2.2012 - the 2nd defendant (to David Colquhoun): "Her name is 'Angel Garden' and she has called herself an astrologer [... She's] more than a bit nuts"

Tab 85 - 19.2.2012 - the 2nd defendant "'She's a psychopath!' which is manifestly true in at least the colloquial sense where these things matter."

Tab 119 - 10.5.2012 - "Andy Lewis and I both think it's a borderline personality disorder. Richard tends to like to actually having a consultation with a person before making that kind of assessment, but he didn't disagree. On the other hand, that IS her disablement, not the foot. The foot is real, but it isn't that bad."

Tab 136 - 27.6.2012 - 2nd defendant "he [1st Claimant] can't leave, she'd try to kill him. She's twice his size (width wise) and might eat her own young if provoked."

Tab 136 - 28.6.2012 - 2nd defendant "She's really ill y'know. The children are in deep shit."

Tab 144 - 15.9.2012 - 2nd defendant "I do not know where i have called his mental health into question, apart from describing his marriage as a 'folie a deux', but I'm very happy to give him an informal diagnosis any time he asks. If he wants one from my husband (a s'senior mental health academic') he will have to be a lot more entertaining."

Tab 206 - 6.7.2013 - 2nd defendant "I think he [2nd defendant's husband] made that analysis in his spare time"

Tab 206 - 21.7,2013 - 2nd defendant "They're pathologically pathological"

Tab 207 - 16.7.2013 - Jo Torres: "I've been extensively briefed on Angel and Steve via Melanie. [...] Mike, my other half, was a bouncer for years so is well versed in efficient removal of crazies."

Tab 227 - 8.11.2013 - 2nd defendant (to Alan Henness and Maria Maclaughlan) "are so grateful to both of you for being so stalwart and loyal to the cause of decency. Angel is madder than the maddest madwoman in the kingdom of mad people, also persistent. If we thought making some sort of statement would help we'd do so, but it would only make her worse. At least when someone googles her the thinkhumanism site appears - she can't erase it. I hoped her pursuit of Andy would bankrupt her, not sure if she hasn't stopped (great for him if she has). Money is what she wants. But thank you, thank you, than you Maria. Mx"

Appendix C

Tab 31 - 4.9.2011 - The 2nd Defendant: " in fact we feel we have to talk to Sands. They're used to odd parents, but not litigious, possibly dangerous ones."

Tab 32 - 11.9.2011 - The 2nd Defendant (to Mike Collins): "It's not a good idea in our view to encourage Steiner parents to view their sites or get involved with any possible (but frankly unlikely) documentary. [...] They [...] are potentially litigious and certainly capable of dishonest or misrepresentation."

Tab 47 - 13.10.2011 - 2nd Defendant: "I will ask someone from the LSN [Local Schools Network website] to be on their guard."

Tab 48 - 12.10.2011 - 2nd Defendant (to Allan Beavis) "She is clearly mad."

Tab 52 - 14.10.2011 - 2nd Defendant: "Will have to continue warning journos (Guardian etc)."

Tab 54 - 17.10.2011 - 2nd Defendant: "Just as long as she isn't gathering significant followers, if one of the major UK papers is following her account I might have to warn other journalists - the LSN already know"

Tab 56 - 23.10.2011 - 2nd Defendant "I wrote to Roger [Rowlings] and said I felt confident he would exercise discretion."

Tab 67 - 22.11.2012 - 1st Defendant (to Killie Sturgess) "I thought I had better warn you, if it has not already happened, that you may be contacted by Angel Garden or Steve Paris, who have a vendetta against me [...] It has been going on for months. I am not the only person who has been subject to their bizarre behaviour. They are best not engaged with. They appear not to be able to function unless they can see themselves as victims of censorship and 'hate attacks'."

Tab 69 - 12.1.2012 - the 2nd Defendant (to Sam): "Angel has a borderline personality disorder. This is a clinical judgement, not a personal opinion."

Tab 73 - 26.1.2012 - 2nd Defendant (to Francis Gilbert): "My husband Richard and I met this woman and her partner Steve last summer, they'd been in NZ but were in England visiting a sick relative. [...] A couple of incidents (which had little to do with their project) convinced us that she is unstable and we withdrew from contact."

Tab 75 - 31.1.2012 - the 2nd Defendant (to the 1st Defendant): "if you're about to write about the Steiner Academy Frome, you'll need to know about a couple of malevolent trolls, Angel Garden and Steve Paris, who may try to use the comments"

Tab 80 - 13.2.2012 - the 2nd defendant (to David Colquhoun): "Her name is 'Angel Garden' and she has called herself an astrologer [...] She's] more than a bit nuts"

Tab 85 - 19.2.2012 - the 2nd Defendant "I just wrote to Dan [Dugan] and said that their working methods are unethical and they are untrustworthy, and that anything else is a distraction."

Tab 85 - 19.2.2012 - the 2nd Defendant: "Just remember - there are lots of people who know about this now and they will tell each other."

Tab 96 - 7.3.2012 - Graham Strouts: "Confused - her [the 2nd Claimant] claims about being expelled from the school would support Andy's (and yours) posts? let me know what's happening.

2nd Defendant: "I think they were expelled because of their behaviour, that it had little to do with the children and even less to do with Steiner ed. They've been hounding Andy and sending him long emails with various threats and comments about Alicia, me etc. He doesn't let them post because they wanted to attack us on his blog"

Tab 100 - 14.3.2012 - 1st Defendant (to John Stumbles) " The poster saw the delay as evidence of some sort of conspiracy and posted blogs and tweets telling the world that I was not to be trusted. I wrote to them when I realised what had happened and explained the situation. I sort of expected the posts to come down and an apology - but the intensity appeared to increase.

At that point I wrote one more time, explaining that this would be my last communication and that my issue was not necessarily what they wrote (but I was in my rights to prevent my blog being used as a stage to attack other people or to carry on disputes that have happened elsewhere) but their subsequent behaviour. They appear to find it difficult to grasp that they do not have an automatic right to use my blog as a platform for whatever they want and that I should engage with them when they show no sense of good grace. Difficult to understand their behaviour. Not sure if it is pure trolling, but in any case, I would rather my Steiner post comments area was used to discuss the post and not deal with angry incoherent people. "

Tab 102 - 26.3.2012 - 2nd Defendant [about conversation with Alan Beavis?] "I pointed out that our objection was to her wanting to 'out' parents, and that she was untrustworthy, which is why WC couldn't promote her work. I also said that I didn't feel her account of events in NZ was to be trusted"

Tab 104 - 29.3.2012 - 2nd defendant "journalism is a small world though. Angel has freaked out Francis Gilbert and Fiona Millar at the LSN. Both write for the Guardian. There was a big Guardian open festival last weekend, with lots of journos meeting and discussing and debating. So who knows what got about. "

Tab 108 - 27.4.2012 - 2nd Defendant [to Mark Haynes]: "I think you will have to say something to Jeevan [Guardian Journalist] about Angel - he's following amonnewsmedia on twitter. I would do it myself were I in contact with him but then I would first have to explain who I am etc., Sam and I have talked about the best way to approach this. We think if you could say that those of us involved in talking to the BHA atm do not endorse her activities, and possibly, that she has expressed herself in a way that suggests she is untrustworthy, particularly with reference to Steiner parents who may be vulnerable and who may not want their identities or personal details revealed."

Tab 110 - 2.5.2012 - 2nd Defendant: "Melissa is part of the LSN and already knows about Angel"

Tab 110 - 2.5.2012 - 2nd Defendant: "sooner or later I won't be able to stop it and then I'll have to say something publicly to distance myself. "

Tab 112 - 3.5.2012 - 2nd defendant: "Andy Lewis [1st defendant] of the Quackometer of course they made their own nasty video about, and he knows most of the big-hitters so he has put out a warning. “

Tab 112 - 7.5.2012 - 2nd defendant "she must know I'm talking to people in private (on twitter)."

Tab 121 - 12.5.2012 - 2nd Defendant “Everyone who needed to know has been informed”

Tab 123 - 13.5.2012 - 2nd defendant ""I've done my very best on Twitter - so many people to write to...I've tried to stop people tweeting their stuff but I don't know everyone. “

Tab 123 - 13.5.2012 - 2nd defendant "I can only see Good Schools Guide tweeting it - I've spoken to her (she was mortified when she realised who it was)”

Tab 123 - 13.5.2012 - 2nd defendant "sent your post to several people who asked if they should be concerned. So there, it was useful.”

Tab 138 - 30.7.2012 - 2nd defendant (to Matthew Ford) "I advise you to steer clear of Angel Garden and Steve Paris, presently of NZ whose videos appear on the web. They're unreliable witnesses, to put it mildly"

Tab 139 - 26.8.2012 - 2nd defendant "I wrote to Ben Woolvin, who as far as I know is making the prog, and included DC in my email. Apart from that if they don't cotton on what a green inker Angel is within 5 minutes, they shouldn't be working for the BBC. Not

that this is any proof of quality. One of these days someone will tell Steve I've warned them about him, and they'll try to sue me for libel. I used the word 'unreliable'."

Tab 140 - 26.8.2012 - 2nd defendant (to Ben Woolvin and David Colquhoun "Ben - a researcher for this programme is now in touch with an individual called Steve Paris via twitter. A warning that he is unreliable (and that they have in no way conducted 'years of research'). David is well aware of their presence online."

Tab 143 - 1.9.2012 - 2nd defendant "I'm certain they'd threaten me with libel if they had evidence I'd warned anyone. "

Tab 143 - 11.9.2012 - Alicia Hamberg "I had got a message from Grégoire on facebook I hadn't seen [...] He thanked me for the warning. I think I confirmed something he suspected."

Tab 148 - 28.9.2012 - Alicia Hamberg " I had to warn a couple of others about them last night - one of them had found that translation and I had to say something. "

Tab 176 - 21.1.2013 - 1st Defendant (to Lewis Skeptics) ""they are dangerous serial stalkers and I try to avoid all encouragement""

Tab 180 - 23.1.2013 - 2nd defendant (to Maura Kwaten) "Angel and Steve demanded that parents come forward and spilled the beans, mostly because it would have given them material for their documentary. They really care absolutely nothing for anyone who isn't useful to them."

Tab 189 - 2nd defendant (to Matt Sims) "Matt - be wary of @sjparis and wife (amazonnewsmedia, angelgarden, steinermentary) [link to Andy's posterous blog] I've been a target too (for months). worth looking up the case Arkell v Pressdram (1971) if you want a chuckle"

Tab 190 - 12.4.2013 1st defendant (to Mark Hooper) "Please do not pass anything on to Paris or his wife Angel Garden. They are engaged in a very unpleasant campaign of harassment against a number of people and I want nothing to do with them. I would be grateful if you did not even mention we had had this conversation as I want to do nothing to provoke them into more attacks."

Tab 191 - 30.4.2013 1st defendant (to David James) "Paris and his wife are serial harassers of myself and several other anti-Steiner writers. I do not engage with them at all. They use every contact as a hook to harass. You are part of a very big pattern. They have tried to do things to me and others that would cause considerable problems. I have not disclosed them as I think the best strategy is total disengagement."

Tab 194 - 15.5.2013 1st defendant (to Ben Hardwidge) "They have displayed disturbing and obsessive behaviour and I must treat them as a threat. "

Tab 207 16.7.2013 1st defendant (to Jo Torres) "my Bath talk was disrupted by Angel Garden and Steve Paris. They have been harassing me for over a year and are as mad as cheese."

Tab 207 - 16.7.2013 - Jo Torres: "I've been extensively briefed on Angel and Steve via Melanie.

Tab 211 - 12.9.2013 - 1st defendant (to Kate, editor of Stroud News) "Stege Paris and Angel Garden (who post as AGarden and SParis) are a couple who have been harassing me online and in real life for over a year. After a comment of theirs on my blog was held up in a moderation queue, they have been accusing me of 'censorship' and of smearing them. There are many defamatory things they say in their comments. For example "openly inviting his readers to doubt the word of a child", "deliberately "disappearing" evidence", "having hidden the evidence and framed us for your audience entirely through personal smearing" "advertising concern for children but silencing real children's voices because he wants a platform for himself". The meaning I ascribe to such statements is that I am being accused of being dishonest with my readers, deliberately withholding information and falsely accusing other people for my own personal benefit. These allegations are completely untrue. Because of the querulous and hostile nature of the couple I have decided not to interact with them."

Tab 218 - 4.10.2013 1st defendant (re members of the BHA) "I am rather pleased they are doing this at the moment. yes it is a little bit of a pain convincing Stephen Law that he has to ban them, but Richie is right on the money and will notify the police before the meeting."

Tab 224 - 16.10.2013 1st defendant (to Richy Thompson, Stephen Law, Sara Passmore) "The truth is that I blocked her from commenting on my blog because of her hostile behaviour towards me and how she wanted to use her comments to attack other people. [...] By writing to you, they only have one intention: to cause me problems by intimidating me and those who I deal with [...] her demands for me to give her money to go away against the threat of a defamation case has failed. "

Appendix D

Tab 160 - 8.11.2011 1st defendant (to 2nd defendant) "I have two choices - not sure which is funniest

1) Completely ignore

2) Responsd simply by referring to Arkell vs Pressdram

Your insight is, as always, welcome."

Tab 201 - 24.5.2013 2nd defendant "This thread is so hilarious: Think Humanism - View topic - Angel Garden and Steve Paris"

Tab 227 -8/11/2013 2nd defendant "At least when someone googles her the thinkhumanism site appears - she can't erase it. I hoped her pursuit of Andy would bankrupt her, not sure if she hasn't stopped (great for him if she has). Money is what she wants. But thank you, thank you, than you Maria."

Tab 140 - 3.9.2012 - 1st defendant "Getting a full translation of a UK blog with some profile (coughs) would neutralise them. And make them hopping mad."

Tab 112 - 3.5.2012 - 2nd defendant "she isn't going to be happy about what they've done. And yes, Angel will go ballistic. I think it will appear very soon."

Appendix E

Tab 108 - 27.4.2012 - 2nd Defendant [to Mark Haynes]: "I think you will have to say something to Jeevan [Guardian Journalist] about Angel - he's following amonnewsmedia on twitter. I would do it myself were I in contact with him but then I would first have to explain who I am etc., Sam and I have talked about the best way to approach this. We think if you could say that those of us involved in talking to the BHA atm do not endorse her activities, and possibly, that she has expressed herself in a way that suggests she is untrustworthy, particularly with reference to Steiner parents who may be vulnerable and who may not want their identities or personal details revealed."

Tab 110 - 2.5.2012 - 2nd defendant "They have realised it's something about the pedagogy - except that in their case it was more about their own behaviour. i wish someone would point that out to them."

Tab 112 - 3.5.2012 - 2nd defendant "she isn't going to be happy about what they've done. And yes, Angel will go ballistic. I think it will appear very soon."

Tab 140 - 3.9.2012 - 2nd defendant "Andy - yes push on, as if in ignorance of any other translation. As always, ignoring them is best ;)"

Tab 140 - 3.9.2012 - 1st defendant "Getting a full translation of a UK blog with some profile (coughs) would neutralise them. And make them hopping mad."

Tab 148 - 28.9.2012 - 2nd defendant "they have a translation too? Bugger. Well, he can't stop them but at least they didn't get any money out of him? so that will piss them off,

and it must have taken a huge amount of time too. The important thing is that they can't copyright it if there are other translations and their is not the only one of the 'official' one.

It may be more readable now but it won't be as accurate in the long run because they don't understand what they're translating, and Roger does."

Tab 148 - 28.9.2012 - Diana Winters "I did see Angel and Steve's translation of Gregoire's article - it looked like a darn good translation, I have to say, though I haven't read but a brief bit; I did have the impressions it was very polished. It is actually a shame we can't work with them on this - a shame that they 'got to' Gregoire a little too soon. I mean it's too bad to have several people duplication efforts with the translation."

Tab 206 - 6.7.2013 - Alicia Hamberg "Anyway, the ICSA is making a fool of themselves when allowing this, which I also said. redacted. He's going to talk to the ICSA people he says. "

Tab 206 - 6.7.2013 - 2nd defendant "Richard is happy to write to this org inclosing their email to the Dean of the Peninsula Medical School, and so on. "

Tab 206 - 6.7.2013 - 2nd defendant "speechless. she told me no one liked her Florence Nightingale one woman show btw, so she seems to be contradicting her previous self analysis. R says she certainly has constructed her own reality. "

Tab 206 - 6.7.2013 - 1st defendant "I saw they were in Venice and wondered what they could be up to. I used to work in Venice and the paranoid part of me thought they might be fishing."

Tab 206 - 6.7.2013 - Alicia Hamberg "I also added that Melanie, I and probably you, Andy, would be available if folks from the ICSA want to contact us. And that there are others too who can testify to what we're saying. "

Tab 206 - 6.7.2013 - 2nd defendant "Exactly our thoughts. Ri is going to write (with his uni email) asking this very question. "

Tab 206 - 6.7.2013 - 1st defendant "Happy to talk to anyone who wants anything checked about them. "

Appendix F

Tab 176 - 21.1.2013 - 1st Defendant (to Lewis Skeptics) "they are dangerous serial stalkers and I try to avoid all encouragement"

Tab 207 - 16.7.2013 1st defendant (to Jo Torres) "I do not want them allowed admittance and will not speak if they are there."

Tab 224 - 16.10.2013 1st defendant (to Richy Thompson, Stephen Law, Sara Passmore) "The truth is that I blocked her from commenting on my blog because of her hostile behaviour towards me and how she wanted to use her comments to attack other people. [...] By writing to you, they only have one intention: to cause me problems by intimidating me and those who I deal with [...] her demands for me to give her money to go away against the threat of a defamation case has failed. "

Tab 218 - 4.10.2013 1st defendant (re members of the BHA) "I am rather pleased they are doing this at the moment. yes it is a little bit of a pain convincing Stephen Law that he has to ban them, but Richie is right on the money and will notify the police before the meeting."

Appendix G

Tab 190 - 12.4.2013 1st defendant (to Mark Hooper) "Please do not pass anything on to Paris or his wife Angel Garden. They are engaged in a very unpleasant campaign of harassment against a number of people and I want nothing to do with them. I would be grateful if you did not even mention we had had this conversation as I want to do nothing to provoke them into more attacks."

Tab 191 - 30.4.2013 1st defendant (to David James) "Paris and his wife are serial harassers of myself and several other anti-Steiner writers. I do not engage with them at all. They use every contact as a hook to harass. You are part of a very big pattern. They have tried to do things to me and others that would cause considerable problems. I have not disclosed them as I think the best strategy is total disengagement."

Tab 211 - 12.9.2013 - 1st defendant (to Kate, editor of Stroud News) "Stege Paris and Angel Garden (who post as AGarden and SParis) are a couple who have been harassing me online and in real life for over a year. After a comment of theirs on my blog was held up in a moderation queue, they have been accusing me of 'censorship' and of smearing

them. There are many defamatory things they say in their comments. For example “openly inviting his readers to doubt the word of a child”, “deliberately “disappearing” evidence”, “having hidden the evidence and framed us for your audience entirely through personal smearing” “advertising concern for children but silencing real children’s voices because he wants a platform for himself”. The meaning I ascribe to such statements is that I am being accused of being dishonest with my readers, deliberately withholding information and falsely accusing other people for my own personal benefit. These allegations are completely untrue. Because of the querulous and hostile nature of the couple I have decided not to interact with them."

Appendix H

Tab 75 - 31.1.2012 the 2nd defendant : "I think they made a film about her experiences after a prem birth too - I bet they tried to sue the hospital. We can only pity the staff involved. I believe she did win a case against a surgeon who operated on her feet. Me next, possibly ;)"

Tab 76 - 1.2.2012 the 2nd defendant "I imagine Angel coming after me for warning journos off her project and causing the WC to abandon her"

Tab 107 - 21.4.2012 - the 2nd defendant "All they want is the money. The money has always been the point for them- they make their living out of litigation as far as I can see.

Tab 76 - 1.2.2012 the 2nd defendant "I imagine Angel coming after me for warning journals off her project and causing the WC to abandon her"

Tab 104 -29.3.2012 - the 2nd defendant "She can't mention me because I haven't written anything she can point to"

Tab 139 - 26.8.2012 - 2nd defendant "One of these days someone will tell Steve I've warned them about him, and they'll try to sue me for libel. I used the word 'unreliable'."

Tab 144 - 16.9.2012 I'm certain Angel is poised to go for me like a ferret up a trouser leg.

Appendix I - Covert/Proxy harassment - including threats to others

Tab 103 - 29.3.2012 - the 2nd defendant "skepticat dm me to say how much she enjoyed it."

Tab 104 -29.3.2012 - the 2nd defendant "She can't mention me because I haven't written anything she can point to"

Tab 207 - 16.7.2013 1st defendant (to Jo Torres) "I do not want them allowed admittance and will not speak if they are there."

Tab 224 15.10.2013 Sara Passmore to 2nd Claimant "We understand that you have made a threat of legal action against Andy Lewis, ...and as a consequence he has been advised

legally not to interact with you. As your presence at the event would involve such interaction, Andy has informed us that he cannot be present if you attend."

Tab 224 - 16.10.2013 1st defendant (to Richy Thompson, Sara Passmore, Stephen Law of the BHA): "I do not want to give them more fuel for this misrepresentations by being present at my talk and having the opportunity to disrupt the meeting and its message."

Appendix J

From disclosure:

Tab 206 - 6.7.2013 - 1st defendant "Although I am happy to be convinced that no bullying took place behind the usual moderate rough and tumble of any playground."

[Contrasting public statements of the 1st defendant:

Steiner Schools and Risk Factors for Child Abuse

"The are consistent reports of how Steiner Schools have a laissez faire attitude to problems such as bullying within schools. As I showed in my last post, the role of the school is spiritual midwifery – teachers are there to help children's spirits incarnate as they grow. Karmic influences need to be worked out and if a child is being bullied then intervention may interfere with the child's destiny. "

Bill Roache, Karma, Reincarnation and Steiner Schools.

"This worldview has consequences within schools. It is a common complaint that bullying goes unchecked as there is a belief that the bullied and the bullier and reversing roles from previous incarnations and these karmic issues must be worked out by the children."

Tab 206 - 6.7.2013 - 2nd defendant "Most of the bullying was them I bet. it is the sheer bombast of the woman - the outer aggression hiding the inner emptiness. And the venom of her...and she is slovenly too, says Joe."

Tab 76 - 1.2.2012 - the 2nd defendant: In Steiner you often hear about it. In Edinburgh apparently a child's arm was broken. I'm not sure if that was ever reported, but I was told that the family (who of course complained) were ostracised by the school community.

Tab 90 - 29.2.2012 - the 2nd defendant - The role of karma is well established, and I'm certain it is sometimes played out in the odd decisions Steiner teachers make about children.

Tab 99 - 13.3.2012 - the 2nd defendant "Steiner schools quite often exclude parents, in my experience. But that's by the by - point is that what they want is money."

Tab 119 - 10.5.2012 - Diana Winters "Sadly, it occurs to me that the stories of what happened to her children are probably NOT exaggerated. Which would make the whole thing just incredibly sad. "

Tab 172 - 22.12.2012 - Diana Winters "I supposed the original reports about their daughter being bullied were probably true - they're in accordance with many reports from Steiner schools"

Appendix K

9.11.2014, Susan Godslan, an expert on dyslexia and sceptic who we had never heard of before, retweeted an article we wrote about how a Steiner school dealt with the matter and informed the 2nd defendant of the existence of said article:

“RT @steinermentary: How dyslexia was dealt with at a Swiss Steiner School [link to article] @thetismercurio”

This action prompted Susan Godslan to follow our @steinermentary account on the same day.

10.11.2014, we noticed that her tweet promoting our article had been deleted. We asked her on DM (private message) why this had happened:

“It was kind of you to promote our article on Steiner & dyslexia, but why did you then delete that tweet?”

No answer was given and Susan Godslan blocked us shortly after.

31.12.2014, the 2nd Claimant was having a conversation with @frozenwarning about the Medical Innovation Bill. This conversation spanned from 9.34am to 1.35pm and remained mostly civil.

then, from 1.38pm, the conversation degraded suddenly:

@frozenwarning's writings include:

"Just realised who you are. You're not only not informed, you're an Internet bully, or should I say bullies."

"No I just remembered that you are a stalker."

"You have nothing but disgusting behaviour."

"No, you've been ignorant and bullying for months."

"you know EXACTLY what you are, and none of it is good."

then out of the blue another person came into the conversation, 2.56pm, @flatsquid, wrote (we do not know who this person is in real life):

"She's fucking mental & I don't use the term lightly having the unfortunate experience of talking to her in person."

"She's obsessive, she stalks online & irl, an absolute nutjob & one of the few I've blocked here"

"her boyfriend/husband will probably appear at some point, Mr Parris iirc, block him too, just as mad."

"She dedicates her life to obsessive behaviour, someone else just PM'd me who has her on block too. Disturbing."

back in 10.11.2012, @flatsquid revealed the source of his information about the Claimants came from the 1st Defendant:

"@Skepticat_UK @Amazonnewsmedia @sjparis Andy was right. You're one very troubled individual."

(present in Appendix 16 and 23 of the Original POC)

Appendix L (see page 36)

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
SWANSEA DISTRICT REGISTRY

Case No. 3SA90091

BETWEEN:

STEPHANE (AKA STEVE) PARIS AND ANGEL GARDEN

Claimants

and

DR ANDREW LEWIS

1st Defendant

MRS MELANIE BYNG

2nd Defendant

CONSENT ORDER

UPON the consent of the parties

IT IS ORDERED THAT:

1. The Claimants be granted permission to amend their particulars of claim in the form of the draft provided to the Defendants on 10 March 2014 (the “**Amended Particulars of Claim**”);
2. That the Amended Particulars of Claim be served by the Claimants on the Defendants or before [] March 2014;
3. That the Defendants file and serve a Defence 28 days from service of the Amended Particulars of Claim;
4. That the Claimants do pay the costs of and consequential to the amendment of the Particulars of Claim, such costs to be assessed if not agreed.

dated this day of March 2014

>> Yes, Mark Thornton is essentially a Nazi whom they pursued to the wilds of
 >> Argentina, and is now living out his days in solitary confinement, yes.
 >>
 >>
 >>
 >>> Date: Tue, 29 Jan 2013 18:02:07 +0100
 >>
 >>> Subject: Re: comment from angel?
 >>> From: zzzoey@gmail.com
 >>> To:
 >>> CC: melanie.byng@gmail.com;
 >>>
 >>> do you have the link to the page where they publish the mediation
 >>> stuff? I have lost it, and their twitter feeds are so full of
 >>> rants...!!
 >>>
 >>> What's more, they only published the 'best' bits.
 >>>
 >>> And, yes, mediation and settled. Once they're done with changing their
 >>> own perceptions about it, they will have been to the war crimes
 >>> tribunal in Hague and got Mark Thornton sentenced to life in prison.
 >>>
 >>> Maybe you should write it up, then sit on it for 6 months (or
 >>> whatever it takes) and then publish it.
 >>>
 >>> On 29 January 2013 17:51, Diana Winters wrote:
 >>> > Aye ... I intend to keep in mind the Ayn Rand quote.
 >>> >
 >>> > It's truly bugging me that we can't write up our thoughts on their
 >>> > so-called
 >>> > mediation. The more I've thought about it, it's such a joke. The school
 >>> > admitted NOTHING. Every single statement was worded to avoid admitting
 >>> > any
 >>> > form of wrongdoing on the part of the school. (The only thing they admit
 >>> > "regretting" is not following through with one specific meeting!!) I
 >>> > think
 >>> > they actually very graciously cleared the CHILD'S name - cleared her of
 >>> > the
 >>> > insinuation that was lying - while leaving wide open the obvious
 >>> > possibility
 >>> > that the parents are nuts, and basically vicious idiots.
 >>> >
 >>> > Gee, I'd love to write it up. Maybe not quite that nastily, but ...
 >>> > maybe
 >>> > some time later, after the dust settles a wee bit. Some time when they
 >>> > are
 >>> > maybe not looking ... I hate for them to go on record as having this
 >>> > fabulous success "taking a Steiner school to human rights" etc., when in
 >>> > fact the school admitted no wrongdoing of any sort, and there's
 >>> > absolutely
 >>> > no reason to believe anything will change for Steiner students as a
 >>> > result
 >>> > of their waging a dirty war against a particular school. I would really
 >>> > like

From:
Subject: VAXXED
Date: 28 January 2017 at 10:41 pm
To:

AW

sent you a message from

Name:	
E-mail:	
Subject:	VAXXED
Details:	<p>I have just left a comment re the recent mob rule article, yet after reading your previous article on the skeptics who took that family to court and seized their home, I have lost my balls. I don't wish to have any ill energy towards me or my family, and although I am sure I can be tracked down. The Curzon were unprofessional but the skeptics are just totally out of control. I am politely asking you to remove my comment Thank you</p>



HM Courts & Tribunals Service

Stephane Paris And Angel Garden
9 Lon Bryngwyn
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SA2 0TX

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www.civilappeals.gov.uk

www.justice.gov.uk

DATE 16 January 2017

YOUR REF:

OUR REF: 2017/PI/10083

Dear Sir/Madam,

Re: Paris & Anr -v- Lewis & Anr

Your papers were referred to the Master of the Civil Appeals Office who has directed the following:

It is not possible to include an application to set aside the judgment of HHJ Seys Llewellyn dated 4th February 2015. That decision has not been the subject of an application for permission to appeal to this court.



The only application which can be made by way of an application notice, is a second application to re-open the final decision of this court made by Lord Justice Simon on 22nd March 2016 in A2/2015/2839. The application notice should be amended to reflect this.

In order for such an application to be issued, the following documents must be filed:

1. Application notice x 2, suitably amended as above;
2. Completed Help with Fees form in respect of both applicants;
3. Paginated and indexed bundle in respect of the second application to re-open. Any fresh evidence, not seen by Lord Justice Simon when he determined the first application to re-open or the oral permission application, should be clearly marked as fresh evidence.
4. A copy of the bundle filed in support of the first application to re-open (A2/2015/2839A);
5. A copy of the original bundle which was before Lord Justice Simon at the oral hearing on 22nd March 2016.

Yours faithfully,

Mr John Hebden
Registry Office
civilappeals.registry@hmcts.gsi.gov.uk

From: Civil Appeals - Registry civilappeals.registry@hmcts.gsi.gov.uk  
Subject: 201710083 CoA Letter [14-03-17(14.38)]
Date: 2 May 2017 at 11:02 am
To: anmletters@gmail.com

CA

Please find letter dated 14 March 2017 as requested.

With Regards

Ms S Pratt

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201710083%20CoA%20
Letter%20%...)%)%5d.doc



HM Courts & Tribunals Service

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DATE 14 March 2017

YOUR REF:

OUR REF: 2017/PI/10083

Dear Sir/Madam,

Re: Paris & Anr -v- Lewis & Anr

Your papers were referred to the Master of Civil Appeals who has asked me to inform you
Of the following:

I refer to the further papers filed in this matter. The applicants have not complied with the directions contained in the letter dated 16th January 2017 as they have filed three different application notices rather than the one application that they were directed that they could make. Each application is dealt with in turn below:

1. *Application to appeal re-inclusion of harassment claims.*
Although it is not clearly stated on the face of the application notice the decision appealed appears to be a decision made at pre-trial review on 2nd February 2015 by HHJ Seys Llewellyn sitting in the High Court. Assuming that is correct the application for permission to appeal that order must be made by appellant's notice (form N161). An appeal pack is enclosed. The application to appeal cannot be progressed by way of application notice. The application notice and papers in support must be removed from the bundle.
2. *Application to re-open permission to appeal*
This is the application that the direction of 16th January 2017 relates to.
3. *Application to recuse Lord Justice Simon*
4. *A formal application for recusal is not necessary. The application may remain in the bundles but will not be separately issued. It will be referred with the papers for consideration.*

In order for this matter to progress the application and supporting papers referred to at no. 1 above must be removed from the papers. The index should be amended to reflect that removal.

Yours faithfully,

Ms Watts
Registry Office
civilappeals.registry@hmcts.gsi.gov.uk