

Witness: A. Garden
Party: 2nd Claimant
Statement No: 1
Dated: 16/2/2015

CLAIM NO: 3SA90091

IN THE HIGH COURT OF JUSTICE
SWANSEA DISTRICT REGISTRY

MR STEPHANE (AKA STEVE) PARIS

First Claimant

MS ANGEL GARDEN

Second Claimant

-and-

DR ANDREW LEWIS

First Defendant

MRS MELANIE BYNG

Second Defendant

WITNESS STATEMENT OF SECOND DEFENDANT MS ANGEL GARDEN

I, MS ANGEL GARDEN of 9 Lon Bryngwyn, Swansea SA2 0TX make OATH AND SAY that:

1. I am the Second Claimant in this matter. I am an artist, film-maker, freelance writer and publisher, married to Steve Paris, and disabled mother of three young children.
2. I make this statement in connection with the defamatory comments made by the Defendants about me, my husband, our family, and the landmark Titirangi settlement. This successful discrimination proceedings against a school of the alternative form of education known as Steiner/Waldorf, for expelling a bullied child and her sisters, reached an out of court settlement. *According to experts, this is the first time that the most reported problem worldwide in this education movement has been addressed through independent*

mediation.

3. The Second Defendant Mrs Melanie Byng is one of several people from a worldwide group which hold themselves out to be Steiner critics (“the critics”).
4. Prior to the settlement of the court action referred to in paragraph 2 of this statement, the critics found our publications, before we knew of them at all, and took it upon themselves to promote our experience. The critics also messaged us with details of other similar situations whilst offering us encouragement and praise for our efforts. It was only through them that we became aware that the situation we had found ourselves in was not, as we had first imagined, a question of a “rogue school”, but was, in fact, a worldwide feature of Steiner education. Their emphasis on this fact encouraged us to go forward with our Human Rights initiative, as we could see how useful a judgement could be to other targets of “unchecked bullying” and their families. (In this respect I repeat paragraph 4 of my husband’s Witness Statement.)
5. Mrs Byng in particular, who held herself out to be an anti-Steiner campaigner, as well as a skeptic and humanist, enthusiastically encouraged us to participate in the public debate. For example, on 9 February 2011, Mrs Byng emailed us to state that the work we were doing was “so good” and that our “vids are brilliant”. She also stated that we deserved a “wider audience”, and suggested that creating a place where people could congregate and share stories about Steiner schools publicly would be “a great idea”. (File “18-1-5 email” of the Claimants’ disclosure).
6. Mrs Byng also contacted us 25 February 2011 to tell us that she can send our videos “to all tame journos”, and expressing a desire to meet with myself and my husband Steve Paris (who is the First Claimant in these proceedings), along with her husband Professor Richard Byng (File “18-1-5 email” of the Claimants’ disclosure). Mrs Byng emailed again on 15 June 2011 inviting my family to her home for the weekend (File “18-3b email”) after

confirming in April 2011 that she had ideas of lots of people we could talk to in order to publicise our experience and our Human Rights action (File "17b-email").

7. By April 2011, we were in Europe as we had had to travel from New Zealand to care for my mother following her sudden and shocking diagnosis of lung cancer at Christmas 2010. We were living in a caravan, and home-educating, occasionally travelling to a small French family home over the course of six months, supporting ourselves by Steve's writing.
8. On learning that we were considering permanently relocating back to the UK in order to care for my mother, Mrs Byng, immediately recommended that her local democratic school, Sands, would be a fine choice for our daughter, as her son had attended it following his own experience of Steiner. She said it was perfect for the kind of rehabilitation into education that she understood our child to need, having been first extensively bullied and subsequently expelled, resulting in an understandable aversion to re-entering formal education. The Byngs offered our 11 year old child to stay with them on her own to do a week's try out at the school (when we looked surprised by that invitation, Mrs Byng said one of us could accompany if that was unmanageable). Our daughter has never met Mrs or Professor Byng.
9. On a trip to visit my mother, Steve and I made a long detour, in order to visit the Byngs and explore this suggestion re Sands school on Mrs Byng's advice. On visiting the school, we met with both the founder of the school and his son and other members of staff. We were shown around the school and Mrs Byng then began to suggest possible places we could live in the area close to them.
10. Mrs Byng made so many offers of help, it became quite overwhelming. We had a huge amount going on what with my mother's illness, the Steiner situation, including the traumatic effects of it on our children, the Human Rights initiative itself, my physical impairment, which was so extreme that I had to try and avoid walking at all times, and

home-educating as much as possible. It was also very stressful being away from home and continually having to relocate from one place to another. Nevertheless, there didn't seem to be anything Mrs Byng couldn't help with, and she kept making more and more suggestions. She continually emphasised that her husband Richard was very supportive, and stressed his standing as a doctor and a senior mental health lecturer at Plymouth University, as well as their admiration for us for standing up to the school.

11. Due to the worldwide similarities in treatment of advocating families in the Steiner movement, she encouraged me to write an article about our case on the Local Schools Network (LSN), in the run up to the establishment of the first Steiner free schools in the UK to "TELL them that they can't ignore NZ - whatever they think" (File "19g (4-08-2011)" of the Claimants' disclosure). She said the LSN was a very high profile blog, read by Michael Gove, and I tried to write such a piece.

12. Due to the obvious high level of stress we were under, Mrs Byng also suggested that her son come over to help out with the children, including tutoring them, in exchange for some French language practice. I was wary of this, and told Mrs Byng of my concerns regarding the reliability of teenagers, both in general and as we had had a teenage au-pair during the time we had a very premature baby, who had turned out to need a lot of looking after herself; she eventually admitted she had taken too much on and left. I told Mrs Byng of this experience to illustrate my concern that teenagers often bite off more than they can chew and emphasised that we didn't need any such problems at this highly stressful time. I also emphasised that the house in France was very isolated. Mrs Byng assured me however, that her son was "very reliable" and would be "there to help". She said that I was what was "most important." (File "2011-04 [Apr]-08 1337" of Claimants' disclosure). She seemed very confident in her son's reliability and the emphasis on her husband's position reassured us that they were undertaking this in full understanding of the multiple stresses in our situation.

13. It was only these constant references to Richard Byng's standing that persuaded us to accept these very fast changes in our relation which had previously been solely based on our joint interest in Steiner education and their unequivocal support for our actions in that regard.

14. Following Mrs Byng's suggestion that her son Joe come and stay with us, my mother's condition deteriorated to the extent that I would need to go back to England to care for her during the first week of what would be Joe's planned month long stay with us in France. In the circumstances, I re-broached the subject with Mrs Byng, advising her of the arrangements with my mother as well as confirming that Steve had recently received a lot of new writing work which meant that he would be unusually busy in that first week. I again stressed the isolation of the area, and my concern that this whole situation would not suit her teenage son. Despite all the above, Mrs Byng confirmed that she was still perfectly happy to send him over, if he could be useful. As such, and being far away from home with so many difficult circumstances to deal with at once, we agreed, and Joe came to stay.

15. I was with Steve and the children when Joe arrived with my brother and his son, who had come to see our mother from the States, and whom he had met at the airport. On arriving at our home, Joe stated "I am your servant".

16. The next day my brother, myself and my nephew left and went back to my mother's home in England. During that week I was with my mother and I was desperately trying to get permission from her doctor for an innovative treatment (known as LDN). This was a particularly difficult time for me as the doctor was refusing permission on the basis that she was afraid of being struck off the medical register. During a phone call with Mrs Byng, on mentioning this issue she immediately insisted I talk to her husband in his medical capacity.

17. Dr Byng then came onto the phone and he asked me lots of questions about my mother's condition and treatment. He advised me that if my mother wanted to take LDN, that we should not accept the decision of the doctor but write again and assert my mother's right to this drug and ask the doctor to investigate it further, which I did. The doctor's decision was devastating to us, as she even admitted that there was anecdotal evidence of LDN shrinking tumours, and the hospital admittedly had nothing else to offer that stood any chance of helping my mother.

18. During that week, my mother and I struggled to come to terms with her impending death. I was placed under considerable stress at that time as due to not being able to stay near to her, with my family, I had to put in place a care package for my mother, which having spent days organising I subsequently had to immediately change as Joe had suddenly decided that he wanted to leave our home at the time that I would be arriving back in France.

19. Mrs Byng had been clear with me that she wanted to help and had stated to me that it was me that mattered because of the situation with my mother. Despite this, even though the fact Joe had suddenly decided to leave meant that the drive home from the airport would be the only time I'd be able to be alone with Steve, he told me that Joe was adamant that he had to leave at the same time as I arrived, making even that time alone impossible. Further, he had advised Steve that he had already booked a train ticket to get back to his parents home and it was therefore impossible for him to be flexible. I later learned through disclosure that that was untrue and that Mrs Byng had pre-arranged to have Joe picked up from the airport (Tab 26 of the Defendants' disclosure).

20. In the circumstances, I discussed this with my mother, who was immediately anxious, as I was, that this meant I would now not get any time with my husband alone after our gruelling week to process any feelings about her impending death, and we both agreed that if the Byngs would not make any adjustment that I should leave her the day before so that I could get that time alone with Steve, before having to face the children, who would

have been cooped up in a hot car for hours. In the circumstances, as that was the only time available, it was very important to us all.

21. Steve made arrangements with the Byngs around this idea and that was how it was resolved with Joe also agreeing to help tidy up so that I wouldn't have to sit in the very messy house, or try to do it myself. My mobility was extremely poor at this time and I was not able to manage. Our family had learned to adapt to my immobility as best we could which meant that Steve was and is a carer. He had been very busy writing that week though. I have since learned from disclosure that Joe told his parents that I was "not walking impaired, [...] just fat" (Tab 117 of the Defendants' disclosure), and also that I myself was slovenly (Tab 121, 206), even though the mess I found on arriving at the house was not mine at all as I hadn't even been there! The stress that Joe's actions put onto me and onto my mother, who was anxious about us, was considerable, and meant that I forgot to sort out wheelchair support at the airport.
22. Shortly before Joe left, Mrs Byng reassured me that they were still there for our daughter (File "20-4 email" if the Claimants' disclosure), who had begun to think of looking at Sands (File "2-Personal Notebook"), following Joe having impressed upon her all week that his whole reason for being there was to persuade her to go. I was still working on the article Mrs Byng had asked me to write, when I had time, and she had promised to help with this too.
23. During the course of these proceedings, I have since learned that Mrs Byng did not like Steve or I asking Joe for his help whilst he was at our home, despite her confirming that he was coming to our house to help us out (Tab 28 of the Defendants' disclosure).
24. Following Joe's departure, we learned through these proceedings that Mrs Byng cut off all avenues of contact with Steve and I immediately ("I blocked her the minute I knew Joe was on the plane home" - Tab 30 of the Defendants' disclosure), and began to misrepresent us

to others stating that we had not treated her son well. I attempted to contact Mrs Byng throughout the rest of August and early September to try and understand why she had stopped all contact with us (disclosure reveals that this has stemmed from us providing her son with pizza from a packet and because we asked him to help clear up. I have learned through the documents that have been disclosed that Mrs Byng both denies to third parties that there was any "contract" between us while also complaining of our failure in our duty of care towards her 17 year old son, who she describes as a child).

25. Although their behaviour in having deliberately involved the children and then cut off all communication, created a huge amount of extra unnecessary stress, we tried to move on, and in the absence of any further communication from Mrs Byng regarding the LSN article, I communicated directly with Francis Gilbert who advised on some changes, and when the final draft was sent to him, thanked me for my hard work.
26. The article was published on 29 August 2011: *"some very good reasons why Steiner schools shouldn't have state funding...a parent's tale"*. It examined why it has been so hard to expose the Steiner movement's vilification of families. We have since learned from her disclosure that Mrs Byng immediately contacted several people upon the article's publication to warn them that we weren't to be trusted (30 August 2011), giving them a distorted version of what took place when Joe stayed with Steve in France and suggesting that her son's change of mind and the subsequent necessary rearrangements somehow meant that our Steiner work (which was the only reason we had initially met at all), shouldn't be supported. ("They are dreadful people, frankly. I don't want this discussed AT ALL publicly of course but I suggest that you treat their advances with caution. I'm forwarding this to Diana in case they try to contact WC. I would urge anyone (including Pete) to be aware that they are not entirely trustworthy" (Tab 28 of the Defendants' disclosure))

27. On 2 September 2011 at around 1am, I promoted the post to other critics by writing a comment on the blog of Alicia Hamberg, a Steiner Critic friend of Mrs Byng's, who had also encouraged others to read our publications in the past, and on whose blog Mrs Byng was a regular and prolific commentator (File "22-4b" of the Claimants' disclosure).
28. Two victimising, vituperative and openly sectarian threads then quickly appeared on this blog and it was the exact people Mrs Byng had warned who then immediately made these attacks (Files "22-4a" and "22-4b"). Whilst Mrs Byng did not take part in this commentary openly, it was impossible not to feel she was the perpetrator of it and that she was operating behind the scenes as well as commenting on that website's other threads.
29. Disclosure reveals how she was not merely watching but actively taking part in the background through email exchanges with the attackers (Tabs 28, 30 of the Defendants' disclosure).
30. The suspiciously illogical, insulting, harassing and deliberately provocative comments being made about our Steiner work, and situation on these threads, were devastating to us, especially as Mrs Byng did not publicly appear in order to clarify any relevant matters: the personal basis of any possible problem that had arisen, her very active role in changing our relationship from being solely based on Steiner, her many personal initiatives or the circumstances that had occasioned them including the impending death of my mother. In fact disclosure reveals how urgent it was to her right from the beginning of the attacks that *none* of these facts be revealed, in order to prevent us from defending ourselves from attack, as well as the extent to which she was encouraging others to continue in this behaviour in the background ("I don't want this discussed AT ALL publicly of course" - Tab 28; "He must think if only Thetis 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'" - Tab 30).

31. It was incredibly shocking, confusing and distressing for us to be suddenly subjected to this public vilification by the same people who had lauded our work so recently, especially when we knew that the attacks had absolutely nothing to do with any of that, but were as she stated above. To hide the truth however, the attacks stated how awful it was that we were trying to robustly address this well-known Steiner situation of unchecked bullying, distorted our Steiner initiative, attacked our stance on speaking out, questioned the anonymity of some of our contributors, our integrity as documentarians, and as people. All this was in direct contradiction of Mrs Byng's and the other perpetrators' earlier admiration of this exact stance.
32. Following the comments made on these threads, a public conclusion was reached, in Mrs Byng's conspicuous absence, that both myself and my husband were liars and fantasists, that we had victimised the other ex-parents of the Steiner school who had entrusted us with their testimonials, and that it was now important to extensively warn others about us on that basis.
33. On 12 October 2011 Mrs Byng wrote to Alicia "All we did was remove our child from the situation and then not interact with them. Had they not appeared on your blog, I wouldn't even have told you." (Tab 47 of the Defendants' disclosure). In fact, as shown above, this was untrue as she had warned several people, all the mobbers, two days before, on 30 August. Nevertheless she used this misrepresentation to encourage further multiple attacks on us by groups. This demonstrates that she would have followed exactly the same course of conduct whether we had defended ourselves or not.
34. As explained above, at this time, Mrs Byng had cut off all communication with us. She was also tweeting and commenting anonymously at this time, thus not allowing us to address the real issues without "outing her". She did however eventually break her silence and

responded to my increasingly distraught emails and texts on 6 September 2011 to state that she was no longer prepared to help us with a documentary or publicise any press releases (neither of which we had asked to do). She also stated that we could not expect her to publicise information involving children as it was unethical, thus indicating that she felt we were unethical for wanting to raise awareness of the practices that were taking place at Steiner schools. It was at this point that Mrs Byng advised us that she would not communicate with us anymore about the matter of our documentary (which we had not asked her to be a part of). Disclosure has shown that this email, which left all the threads of her actual unsolicited initiatives to me, my child and my family, unresolved, was subsequently mentioned by her to third parties, in order to show how unreasonable we were and how reasonable she had been. (File “22-6” of the Claimants' disclosure)

35. Following the online mobbing, which lasted days, on top of my mother's impending death, the emotional distress and anguish I felt was so acute, that I was almost unable to function properly. We tried to see it as some sort of misunderstanding, but had no means to address it on that basis. It seemed impossible that anyone could behave in such a horrible manner, especially people as keen to help and “aware” as Mrs Byng and her husband. It was so stressful that I felt physically ill and became progressively more concerned about what she was telling others privately. In fact, disclosure reveals that she started warning others beyond the initial group of mobbers immediately after the attacks on Alicia Hamberg's blog, like on the 11 September 2011 to Mike Collins (Tab 32 of the Defendants' disclosure). This was done before we'd published anything about this matter online.

36. Mrs Byng's actions including her silence, and the immediate about-face of her friends made it pretty clear that she was spreading untruths, and that her friends were more than happy to run with them for her, we didn't know what to do. They were so well established, we didn't know how we could possibly defend ourselves. I tried to write down what had happened, but after trying for days, I just couldn't make any sense of it, so in the end, Steve, my husband, helped me write a piece, simply stating the facts of what had

happened between us and the Byngs and we posted it online on the 13 September 2011 (File “26-Have You Been Mobbed article” of the Claimants’ disclosure), just for it to be there as a record on that date. Even then it was clear, given the circumstances, and the violence of the mobbing, that contemporaneous publication of the facts was necessary in order to ever have any chance of correcting the misrepresentations in the future.

37. We did not attempt to publicise this post at all, although we did send the link to Mrs Byng, hoping it would convince her and her husband to stick to and deal with the facts, and hopefully start to resolve their obvious issues with us. Unfortunately, the desired effect of this post did not materialise (File “Angel - Have you got anything to add?” of the Claimants’ disclosure).
38. On 24 September 2011, a new survivor of Steiner education commented on Alicia Hamberg’s blog, detailing yet another appalling story. Mrs Byng responded to this person provocatively by saying “we were so lucky that our children weren’t hurt in this way [...] but you couldn’t have known what you were getting into.” Her response was so similar to how she initially treated us that I felt it crucial to break my silence and respond, in an attempt to warn this new person how offers of support can so easily turn to attacks by Mrs Byng. This led Alicia Hamberg to delete that comment and ban us from her site. (File “28-Have You Been Censored” of the Claimants’ disclosure)
39. The continued public secrecy around the true circumstances of Mrs Byng’s anger, led others to continually attack us on the basis of our Steiner initiatives instead. As soon as we sought to defend our position and respond to the many defamatory comments made about us on the Steiner Critic’s blog, further widespread and prolonged harassment shortly followed. We were only tolerated as objects of ridicule. We were banned and blocked whenever we sought to confirm the actual true origins of our vilification in the circumstances of Mrs Byng’s behaviour towards us, which gave us no opportunity

whatsoever to correct the untrue and defamatory comments levelled at us.

40. This pattern became more widespread and began to occur on whatever sites we accessed concerning Steiner criticism and later expanded into humanism and skepticism generally. We managed to remain polite in face of all provocation although we named and objected to it, but in any event, on attempting to correct the statements being made, we would end up being banned from the sites we accessed.
41. During these proceedings and upon further disclosure of documents from the Defendants, it has become apparent that Mrs Byng has an unbridled hatred of me, ("I am happy to give her a hole in the head anytime" - Tab 131) which she has freely expressed and spread it around privately as well as freely telling third parties untruths and distorted personal details about me and my family, "[borderline personality disorder] IS her disablement, not the foot. The foot is real, but it isn't that bad", (Tab 119 of the Defendants' disclosure) all while publicly pretending total disinterest and innocence protected by third parties publicly vilifying us, acting as her proxies. This course of conduct by Mrs Byng has had a devastating effect on our family over a period of years.
42. Mrs Byng's communications reveal that she and her friends also began to track our physical whereabouts, and she boasted that her husband could easily phone up my mother's care team when she and her friends cyber-stalked me to the hospital, as revealed in disclosure (Tab 39).
43. The treatment of us and the actions by critics following Joe's departure, including mobbing on blogs and flaming and vilification on Twitter, led us to be extremely concerned for other families who may approach the critics with their issues and or/stories given the initial overwhelming interest we had experienced, which was shortly followed by rejection, vilification, open victimisation and defamatory comments being made about us with no right of reply. We therefore felt it necessary to publish an Open Letter to the Steiner critics

setting out the facts of the victimisation we had experienced and asking for transparency about issues of gate-keeping. We published the open letter on the 12th October 2011 and emailed it to seven critics.

44. Ms Byng's actions in sending her son to persuade my daughter to try Sands school on the basis of her awful experience and then dumping her were extremely similar to those of another one of my children's teachers at the Steiner school, as well as corresponding to many other reports of victimisation of children and families by this education movement. My comments on this have been widely misrepresented (even in the Defence) as containing a sexual inference, whereas Mrs Byng has clearly shown herself in disclosure to be perfectly well aware there was no such inference, and that I was referring to Sands school as above ("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" - Tab 75 of the Defendants' disclosure). She did not merely "suggest" Sands, but her approaches, including to my daughter, went a lot further than that. However, her awareness of what was meant, shows that she is entirely responsible for widely spreading such a smear about herself but has falsely attributed it to me including telling others that I've spread it to journalists, which I have not. Disclosure shows that it's actually been useful to her as a further distortion to use in our demonisation without any acknowledgement of her actual approaches to our child. All her mentions of this quote deliberately left out the part where I specifically explained what I meant in exactly the same kind of language that I described the similar inappropriate conditioning actions of a teacher in Steiner who did the same: creating a "special" reason to communicate with a child and then rejecting that child harshly very soon after. Such reports of the deliberate abuse of power are not unusual in the victimising and authoritarian environment of cults. Mrs Byng knew about my opinions of this teacher and her previous emails to me show that she felt that we, as parents, were being lied about, and knew of the problem of the way the schools present themselves vs what they actually do.

45. Mrs Byng's contradictory statements about duty of care and contracts show that while she felt we owed her "child" a duty of care, and used her anger about that to fuel the campaign against us (even though he left exactly when he wanted to go, following being billed as so "reliable", and was given a ride to the airport) she did not recognise her own responsibility in deliberately making approaches to an 11 year old in the manner she did, on the basis of her concern that the child had already been victimised by a "cult", and then just dumping her.

46. The only reason she had to "explain" this situation at all, or that we have to include any of these personal matters, is because of the way she deliberately distorted the unpleasant "personal" effects of her initiatives as a pretext to begin our total destruction ("A couple of incidents (which had little to do with their project) convinced us that she is unstable and we withdrew from contact." - Tab 73 of the Defendants' disclosure). Hiding these facts, as she has, has created a convenient situation for her, where, in order to defend ourselves, we are the ones who have been forced to record the truth about the personal element of our contact, simply to make sure the facts don't disappear. This made it easier to dismiss us as personally "obsessive" about the 2nd Defendant (and later the 1st Defendant), under the loud pretence that there was something wrong, or different, about our Steiner experience compared to all the other anonymous examples that she and her friends continue to accept so readily with no evidence at all.

47. The First Defendant in this matter, Dr Andrew Lewis, held himself out to be an evidence based skeptic. He had, prior to his Steiner publications on his blog, established a reputation for himself in the field of alternative health which had produced a reasonable following on his Twitter account.

48. Since 27 February 2012, Dr Lewis has been actively seeking to establish himself as a Steiner expert, progressively moving from blogging about it, to a national tour of talks on the platform of "What Every Parent Should Know..." about Steiner education beginning in

November 2012. He was also progressively being interviewed and publishing documents stating that Steiner was a dishonest cult, as well as announcing an intention to publish a book about the subject, to offer his expertise to people.

49. Immediately before publishing his first Steiner post, Dr Lewis published a provocative Tweet, which was re-Tweeted by Mrs Byng stating that “I expect to make a new set of enemies with my next blog post. always exciting” (File “65a” of the Claimants’ disclosure). We understand from the documents which have been disclosed during these proceedings that Mrs Byng had specifically warned Dr Lewis about us, through misrepresentation, on 30th January, weeks before he began to publish on Steiner (Tab 75 of the Defendants’ disclosure).
50. The fact that Dr Lewis’ attitude towards us clearly pre-dated his Steiner publications, is revealed by his disclosure. Shortly before he began publishing on Steiner I happened to find and honestly critique (on 2 February 2012) an article about home-birth that he had written (I am an advocate for home birth). He referred to this to Mrs Byng in an email as “she is pre-attacking me” (Tab 75). At the time he said that we had no idea of his intention to write about Steiner and there was no way we could have.
51. Given the level of attack we had sustained for 6 months, and the provocative communication between the Defendants looking forward to making enemies shortly before publication, we were, when he published, immediately concerned that Dr Lewis’ may have bought into Mrs Byng and her gang’s misrepresentations, and their campaign against us.
52. This concern was heightened when he then he published a provocative tweet saying “If you want to understand Steiner Schools, you should follow @LovelyHorse_, @ThetisMercurio and @zzzoey” (Alicia Hamberg) on whose blog we had been so severely mobbed in order to hide Mrs Byng’s actions, and where Ms Hamberg had now published a further extremely victimising and deliberately provocative comments about us

with no right of reply, including one concerning the children's expulsions, saying how she admired the principal and that the school had handled the situation "elegantly" in expelling a bullied child and her sisters.

53. We felt we had to find out whether his provocative statements and his open admiration of our mobbers meant that he had indeed bought into their harassment of us, which we didn't want to believe, and we commented, but the comment went into the spam filter. Our suspicions that he was "on board" with the mobbing were confirmed by his frosty responses to our subsequent attempts to communicate with him.
54. Despite explaining to him the unreasonable harassment, vilification and provocation we had been subjected to, Dr Lewis' connections with Mrs Byng as well as other skeptics, led him immediately to collude with their efforts to censor not only any revelation of the harassment we had experienced by them, but also the factual information concerning our Human Rights action we had brought against the Steiner School for unchecked bullying, and about Steiner schools in general. Despite advertising himself as being only interested in evidence, stating that "I accept comments from all, critical or supportive", even telling us in an email that: "I publish all comments without moderation" and was only interested in the "spirit of open debate", he blocked our email addresses to stop us from joining in, which blocking he did not publicly advertise, nor make any mention to his readers of having gone against his "no moderation" policy.
55. Notwithstanding his blocking of evidence of known dangers, a fierce debate soon began in his comments about whether there was any actual evidence of such a thing as unchecked bullying in any Steiner school. One of the commenters on Dr Lewis' site, told us that we were the only people providing any evidence of this whatsoever, when we were reduced to sending him our information by email, advising him that we had been blocked from posting comments on Dr Lewis' blog. The commenter could not even understand this because the evidence-based skeptic's advertised open policy made it unimaginable that he would do

such a thing, which given that he was doing it, was also extremely provocative to us. He was using others' belief in his "open" position, to hide what he was really doing (File "2012-03 [Mar]-08 at 12.05" of the Claimants' disclosure).

56. Dr Lewis' actions were extremely provoking, and also deserved investigation in the public interest given the number of people honestly asking for the evidence of unchecked bullying, as well his stated comment policy, and advertisements of openness and being evidence-based. Still, we wanted to be absolutely sure that this blocking was deliberate, as he had claimed it was due to "filters", but as we found that our actual addresses were blocked, it didn't add up. We could not believe that he was so deceitfully hiding the very information his audience was debating. Eventually, in order to stop us commenting, Dr Lewis put the phrase "Human Rights" into his spam filter which we documented in a video which we published, on 8 March 2012: "The Ethics Video".

57. Following the school's initial refusal to mediate, they were persuaded to change their mind by the involvement of the Director of the Human Rights Tribunal, and we began the mediation at the end of April 2012..

58. As the issue of Steiner free schools was hotting up we made a video in April 2012 about the subject ("The Gove video"), just before we started mediating with the school. We understand from the documents produced during these proceedings that Mrs Byng and her friends worked very hard to try and bury it, even though it was in line with their own stance. Ms Hamberg even stated in an email to Mrs Byng that they had to make sure no one mentioned our video in order to "minimising damage" (Tab 123 of the Defendants' disclosure). We understand that Mrs Byng went as far as to convince people through private communications to remove already published re-tweets of it from Twitter.

59. The deliberate provocation and harassment of us continued, by the original three mobbers referred to in paragraph 28 above, when they began to “discuss” our video on the American “public service” Waldorf Critics site. We tried to defend ourselves, but disclosure shows that the clear aim was to provoke us in order to have an excuse to ban us (“Diana has boxed them into a corner. It isn’t going to be easy to respond gracefully. - Tab 112; “Eventually they will get angry, and then it probably won’t be hard to get rid of them.”- Tab 113; “I hope they engage with Pete some more; he’ll provoke them...” - Tab 113). When we managed to maintain good-humour in spite of their best attempts (we were aware of their tactics by this time, and knew what they were trying to do), they just banned us anyway.
60. This mobbing led Alicia Hamberg to write her targeting, victimising an extremely provoking post *Angelic Disharmony* on which both Defendants commented with victimising untrue comments, 1st Defendant: “a rage ensued [...] after trying to communicate with them rationally, the rage got worse and I told them I would not be corresponding with them any more and I have now filtered them of my life. Best ignored”, and Mrs Byng’s threat “it will end in tears but they won’t be ours.”
61. Again, in around August/September 2012 when the French ex-Steiner teacher Grégoire Perra was sued in France for speaking out about Steiner, having publicly renounced it, we arranged with him to translate some of his writing. He was very pleased with the translation saying it was “beautiful work, very accurate and elegant”. Another translation was hurriedly produced by the Steiner critics and disclosure reveals that this was done specifically so the critics wouldn’t have to refer to our work. Mr Perra was also publicly warned by Mrs Byng’s friend Alicia Hamberg of the dangers of having anything to do with us, and he has since stopped communicating with us.
62. I have learned through these proceedings of the desperate lengths that Mrs Byng and Dr Lewis went to, to try and find someone to come up with another translation, in order to prevent anyone reading ours (“Andy - yes push on, as if in ignorance of any other

translation. As always, ignoring them is best ;)" Tab 141 of the Defendants' disclosure). This was all in spite of one of the critics admission in a disclosed email, that the translation we did was "a darn good translation [...] very polished" (Tab 148 of the Defendants' disclosure) and that it was a shame to double up work in this way. Nevertheless they all worked hard to get rid of our attempts to publish about Steiner, and increasingly about anything at all.

63. Over the following years, despite repeatedly requesting that the hateful, provocative and defamatory statements being published about us and our children, should be corrected and requests that he refrain from colluding with such victimisation without being willing to examine the evidence, Dr Lewis refused to do so. Quite to the contrary, these requests made by myself and my husband on behalf of my family, however polite, were always used against us to further damage our reputation and to further conceal the truth about our legal action against the Steiner school as well as Mrs Byng's many personal approaches and initiatives. All the true facts have been hidden under mental health smears and insinuations of dangerous criminality by the Defendants and their friends.

64. Far from "not wanting anything to do" with us, disclosure shows that the secular gang were physically stalking our movements ("the hospital will be in Guilford Home | The Royal Surrey County Hospital - NHS Trust. One call from [Richard] to this team... Palliative Care" (Tab 39 of the Defendants' disclosure), "our friends are not just on a jaunt to Venice. Angel is speaking at a conference on cults. Jeebus" (Tab 206)), approaching those we talked to, and others who we might talk to in the future, personally smearing us ("they're entirely untrustworthy and mendacious and manipulative and above all, selfish" (Tab 30)), sharing private personal information including about my family, and my impairment, and making up "facts", such as that I was an astrologer (Tab 28, 58, 75, 80, 115, 132), that I had "hammed it up" at my interview to get a blue badge (Tab 184), and anything to make me look as bad as possible to people who didn't know me at all, especially other skeptics

and humanists, whilst hiding the true origins of the campaign against us.

65. This severe and extremely distressing provocative campaign of harassment continued during the entire period of our mediation with the Steiner school, in which we were attempting to address unchecked bullying within the school. This in itself was something which is acknowledged by critics of Steiner to be extremely stressful and hard. The 1st Defendant tweeted to a journalist on 14 June 2013 (when he was in a position to know about the landmark settlement), that "no-one will call them out. It requires too much work to expose them!" (File "2013-06 [Jun]-14 at 13.22" of the Claimants' disclosure). The campaign extended to provoking us by openly wishing we would fail in our mediation. One method they used was linking, from the Angelic Disharmony blog post, to the school's website, hoping that the school would see the link through their website analytics, learn how we were being attacked and presumably use that information against us in our dealings with them through the Human Rights Commission. In fact, disclosure revealed that Mrs Byng had considered trying to sabotage our mediation process back in April 2012: "if someone was to suggest to the commission that they are unsafe they'd be doubly unlikely to support a legal case which they'd then have to pay for themselves", to which Alicia Hamberg replied "problem is, I think, that to suggest this, you might have to reveal who you are, and Angel and Steve would have the right to know this too. Personally, I wouldn't risk it. They'd go after you for libel." (Tab 109).
66. We were so concerned about the level of harassment endured by my family, and the defamation that was being published when we were unable to address it, being out of jurisdiction, that my husband and I attempted to alert others about it through publication. In any case, it remained our only option, apart from just to let them do it. Had we not contemporaneously published the original situation with Joe Byng, for example, as with all the other things that happened (many of the attacks that our publications were responding to, for example, have now been deleted) we would not ever have been able to bring this

case because it would have been said that we had just made it all up and there would be nothing to contradict that.

67. On the 29th of October 2012, I wrote a blog post that tried to sum up the difficult position we found ourselves in, and my struggle to support free-speech in face of the awful personally victimising and provocative stuff the critics were writing about us without giving us any right of reply. Observing the necessity to support freedom of speech even if you are provoked as a target of hateful speech, I tried to reconcile their freedom of speech with my own, which I knew would end up being regurgitated in their defence, when/if we ever got into a position to address it legally. *“Their hateful actions have produced a situation in which I must now use my own right to free-speech to express my disgust at this behaviour to the very limits of the law - and this I will do, to point out exactly where they have gone beyond them.”* (*Free Speech vs Hate Speech - Tab 48 of the Defendants’ disclosure*) In spite of the Defendants’ apparent support of freedom of speech and the fact that they have taken advantage of Wordpress’ free-speech policy to publish their defamation, (Wordpress recommend that the remedy to bad speech is more speech) this quote from my post has appeared verbatim in the Defence!

68. The distressing contradiction of being constantly defamed with no right of reply by people on such an obvious moral platform of “evidence-base”, “humanism” and “open debate”, which was only being achieved due to the size of the gang involved and us being out of jurisdiction, was exacerbated by our observation of skeptics’ and humanists’ continually publicly stated values with regard to evidential debate, their commitment to free speech in libel reform, and their consequent robustly challenging approach to discourse on Social Media (such as Dr Lewis’ hundreds of tweets to @HomeopathicDana since 2010 for instance, which includes many deliberately provocative and insulting statements). Following their lead, we therefore decided to behave likewise (although we believe more politely) in the belief that these values would prevail and such communications could help to relieve the situation. Therefore I was alarmed to learn that the third parties’ attitudes

would either be immediately hostile, refusing to believe or even listen to what we were saying, jumping to the conclusion that we must be wrong if other evidence-based skeptics had said so, or had dramatically changed from initial cordial communication to indications that we had done something awful to Mrs Byng and her husband. For example, a twitter user known as @noodlemaz told us on 3rd November 2012 "I am concerned about my friends; I apologise if it is unfair on you but I know and trust some people, I don't know you." (File "2012-11 [Nov]-3 10.03a" of the Claimants' disclosure), and "I heard negative and concerning things. They may or may not be true but I'd rather leave it at that, if you understand." (File "2012-11 [Nov]-3 10.03b"); but by March 2013, she told another Twitter user "beware of these people. Harassing stalkers." (File "2013-03 [Mar]-26 17.34") and "I don't follow those people and would recommend you also block" (File "2013-03 [Mar]-26 22.21").

69. Other third party skeptics and humanists jumped to the conclusion that we were merely "Steiner weirdos", because otherwise, why would skeptics be flaming/vituperating us? This misunderstanding was also convenient for the Defendants and it was not corrected as in the case of tweets following our attendance at the public meeting in Bath. There were also increasing mentions of mental health problems in references to us, and being used to bully others away from us. We were never informed of what we had allegedly done.
70. Seeing how skeptics continually approach those they consider to be disseminating "misleading information", over a year after the attacks started we also decided to try and contact organisations, along with some organisers of the Skeptics in the Pub meetings where Dr Lewis was scheduled to speak, to see if they were comfortable with having a speaker, or an interviewee, who was misleading his public when it came to Steiner schools and unchecked bullying. This was done in a way similar to how skeptics, led by Dr Lewis, contacted organisations they consider to be disseminating misleading information, for example, following a subsequent "Call to Action" by the 1st Defendant concerning the magazine "What Doctors Don't Tell You", armies of skeptics bombarded outlets by tweet,

and email, asking them why they were stocking the publication, and cautioning them to stop doing so, on the basis of its offering misleading information to its readership. As part of this campaign they also introduced a web-site with a deliberately similar name to the magazine, introduced hash-tags etc. These ongoing prolific actions eventually persuaded several large chains to cease selling it.

71. Meanwhile we noticed that Dr Lewis' collusion was leading to more serious misinformation and that the pedagogically influenced unchecked Steiner bullying was actually being removed from the public debate; for instance, when Dr Lewis published his main article on Steiner in November 2012, "What Every Parent Should Know About Steiner-Waldorf Schools", he didn't mention it once in his article, even though another prominent Steiner critic had published his findings in May 2012 from compiling numerous online accounts, and stated that "it seems the MOST problematic issue in Waldorf is unchecked bullying" (File "Pete Karaiskos -"it seems the MOST problematic issue in Waldorf is unchecked bullying"" of the Claimants' disclosure).

72. In spite of the 1st Defendant's own manner of unsolicited open and robust approach to those he calls "quacks", it also became further apparent that there had been covert communications between the Defendants and third party Sceptics. I was very alarmed and upset to read Tweets naming me as a source of harassment and one Tweet in particular which stated "Andy was right. You're one very troubled individual." (File "2012-11-09 at 22.16" of the Claimants' disclosure). Through these proceedings and the disclosure of documentation, I have been very distressed to learn of the extent of the campaign against us and in particular the extensive campaign to smear my mental health. I simply felt sure that if people knew how the Byngs had approached us with multiple offers and then suddenly rejected us when Mum was dying, they would have said that she was just being cruel. It was shocking to remember how hard she had persuaded us, by continually mentioning her husband's standing and job. The Byngs both went into the Guardian newspaper on the basis of his standing, to complain about Steiner schools in the same

month that Mrs Byng had publicly told someone to ignore me because I was mad, which contradiction was hard to believe, and felt extremely demeaning, and distressing. It was also extremely provocative, and showed how confident they felt about the huge pile of lies we were now buried under. Disclosure has shown that although I correctly identified the mental health smearing, including Richard Byng's inferred collusion, by publishing following their appearance in the press, as well as writing to the Dean of Plymouth University to object and seek assistance, I had no idea how bad Richard's collusion was until reading the disclosure.

73. At the time it was just lots of tweets appearing to agree that I was "mad" in some form or other, but the emails in disclosure reveal the lengths that were gone to to produce this effect. I was extremely alarmed and distressed to learn from the disclosure, that Mrs Byng' had very shortly after her sudden repudiation, defamatorily asserted that her husband had made a "clinical judgement" of me and that I had a "Borderline Personality Disorder" (Tab 69). It was claimed that this diagnosis was entirely based on the phone call about the LDN, when I was very distressed about not being able to even try to help my mother, facing her death, and when he was ostensibly telling me how to continue to support her.

74. Open indifference, flaming and blocking by many people together, taunting provocative victimising "discussions" on public sites where we were denied right of reply with the excessive covert "attentions", smearing and lies, put us into an impossible situation in which more factual publication was the only thing we could do about it at all in our own defence, or just let them achieve their unfettered character assassination. Publication also had to be immediate in response to provocation or it would be claimed that we had made it up, as we were continually framed as liars. Dated publication backed up with evidence seemed to be our only hope. And this only available means of proving what actually happened is what is now framed as "harassment" by the Defendants, whose disclosure clearly shows that their main concern was to prevent others from finding out what was

really going on.

75. Comments by others making reference to our case or to the Mr Gove video were being deleted from Dr Lewis' blog, and nobody was allowed to mention us or our work. For example, on 6 November 2012, a post about us was removed with Dr Lewis publishing the words "post removed for sock/meat puppetry." Others were just removed without disclosing the action. Disclosure has revealed what a conscious and widespread policy this was and how the defendants made sure that our case, and the agency for families in Steiner afforded by our family's efforts after the expulsions of the children, would be buried.
76. In early November 2012, Steve informed me of a "Direct Message" communication which took place privately on Twitter on the 3rd November 2012 between Andy Lewis and @animalsinsuits, which clearly demonstrated his awareness of the upset and distress caused by the outcome of the contracts between my husband and I, and Mrs and Professor Byng and that he knew that this was the real reason for the campaign against us, "Amazon woman has behaved terribly towards Thetis and made up a whole string of very terrible lies" (File "20121103-DM 07" of the Claimants' disclosure). This further confirmed our suspicion that Andy Lewis was an active part of the group covertly fomenting harassment of us. He threatened the user by saying "All I can say is there is very low tolerance with some people for anyone who is engaged with sjparis or amazonnewsmedia" (File "20121103-DM 05"), shortly before he blocked that user.
77. The amount of hurtful and upsetting untruths about myself online was getting more and more distressing, and the fact that he was censoring anybody from commenting about it, meaning that his readers were also being denied information about our potentially useful case of agency for unchecked bullying, was beyond provocative in its open dishonesty. We again wrote to Andy Lewis on 8 November 2012 asking him to urgently address these matters. Due to his history of blocking us, we did not even know how to make sure he received our email, so we sent a tweet to a third party, including Dr Lewis' twitter name

within it in an attempt to make sure he saw it: "@SLSingh Have emailed @lecanardnoir defamation notice. He's blocked all avenues so apols 4 including you in tweet to ensure that he sees it." (File "2012-11 [Nov]-8 at 2237" of the Claimants' disclosure)

78. I was shocked to learn that Dr Lewis had published our letter to him the next day on his secondary "Posterous blog" together with a highly defamatory blog post including the comment in which he stated that we had "*claimed*" that our children were expelled because they were being bullied but he understood that the school had "*said*" it was because of our behaviour. It was very shocking that someone so openly seeking personal influence writing about the cultish dishonesty of these schools, and who knows how they vilify advocating families, and had published about abuses in Steiner only days before, would not even mention this to contextualise his defamatory comments despite the fact that our complaint concerned the most reported problem in those schools worldwide as reported by other critics. It was also shocking to see that he did not even inform his readers of the fact that we were in the middle of mediating with the school through the Human Rights Commission, something no one had managed to do before.

79. It was also shocking that his smear put so much more weight onto a school's account from a movement he describes as an "insidious cult". Giving "false balance" to "Quacks" in the media is a subject he has expressed strong views about like "Classic False balance. Mainstream view vs. utter cranks" (file "2013-03 [Mar]-03" of the Claimants' disclosure), "I am wary of 'debates'. Can give very false balance. Especially where one side is steeped in esoteric and misleading language" (file "2013-06 [Jun]-14"), "providing counter arguments to fringe claims is false balance. Gives impression of legitimate doubt where none really exists" (file "2012-04 [Apr]-21"). Yet here he was, putting a lot of weight on what the school "says" against our "claim", as parents, which language in itself completely obfuscated the fact that we were supporting reports of bullying made by an 8 year old child. Disclosure shows that he told others, in spite of publishing about the pedagogical unchecked bullying in Steiner in at least two articles, that in our case, he was "happy to be convinced that no

bullying took place beyond the usual moderate rough and tumble of any playground” (tab 206 of the Defendants’ disclosure). I didn’t know he had contradicted himself like that then, but I felt the total indifference to bullied kids that his provocative “claims/says” statement shows.

80. I was then suspended from Twitter for making multiple @ mentions where I had not. This type of suspension only occurs when multiple users report someone as doing so, and indicates that third parties were asked to make this report to get me suspended. Dr Lewis’ behaviour shows how confident he was that he the efforts of the 1st Defendant and the proxies had made it easy for him to so blatantly both misrepresent the public record, and go against his public position without expecting anyone to even notice. On the contrary, he could expect support in attacking us.

81. The way they portrayed our situation with the Steiner school demonstrates the level of malice on both Defendants’ parts as they both know how these schools vilify families who speak out: “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 76 of the Defendants’ disclosure), “Steiner schools quite often exclude parents, in my experience.” (Tab 99), “The extraordinary lengths the French Steiner Movement went to in order to hide the truth about Steiner Schools.” (File “2013-07 [Jul]-25 at 18.41” of the Claimants’ disclosure), “Bullying issues in Steiner Schools could be symptomatic of their beliefs in allowing 'karma' to play out.” (File “2014-05 [May]-01 at 10.40am”), “Understand that you will be lied to, many parents are referred to in neg. terms behind their backs” (File “2013-03 [Mar]-12 at 9.03”), “Stunning, sinister behaviour reported about Norwich Steiner School upon receipt of a parent’s concerns.” (File “2013-04 [Apr]-29 at 13.04)

82. Dr Lewis’ post was greatly upsetting not only to my husband and I, but degrading and insulting to our children who had been expelled from the school following one of them

having been subjected to unchecked, serious and prolonged bullying over several months. Nevertheless Dr Lewis' attitude to the seriousness of bullying is shown by his private comment to Mrs Byng when deciding how to respond to our very distressed email: "I have two choices - not sure which is funniest: 1) completely ignore 2) respond simply by referring to Arkell vs Pressdram" (tab 160 of the Defendants' disclosure) This post was circulated widely to thousands of Dr Lewis' followers, who numerously disseminated it further, including Mrs Byng who re-tweeted it three times.

83. In December 2012, we finally settled with the Titirangi Steiner school, following a seven month mediation, with a settlement which admits there was bullying and states that our daughter's reports of it were honest, and that our actions in advocating for our own as well as other children, as well as being dutiful and natural, had also been encouraged at all times by the school itself.
84. We noticed around the end of January 2013 that Alicia Hamberg deleted from her site the four positive articles she had written about our experience and our work. These were entitled "repost: steiner school new zealand", "new website- rudolf steiner federation messenger", "tainted spiritual legacy of dogmatic zealots' (- what else?", and "an education movement that doesn't encourage questions".
85. In March 2013, the New Zealand media discovered our Human Rights Settlement and we were featured on the front page of the New Zealand Herald, the country's only national paper. This led us to being interviewed by radio stations and appear on the prime time TV news show "Seven Sharp". Ali Mau, the interviewer, told us while we were getting ready, that they wanted to feature us because no one in New Zealand had ever taken a school to task over bullying before.
86. Following this media coverage the Titirangi Steiner school published an "open letter" on their website contradicting in its entirety the settlement they had recently signed in front of

the Director of the Human Rights Tribunal of New Zealand. Despite assuring the Director of the Tribunal in June 2013 that “the letter has been taken off the website”, that page was only taken down sometime towards the end of 2014.

87. The Posterous blog was eventually closed down in late April 2013. However I was very distressed to note our requests for relief and objections to the posts had been ignored and that Dr Lewis had re-published the earlier defamatory post in its entirety on his Quackometer blog. His statements in this publication were even more obviously incorrect at this point given that the litigation we had embarked upon against the Steiner school had now settled in December 2012 and been widely reported by New Zealand media in March 2013, so it was a fact that could easily have been verified by checking the public record, especially considering how Dr Lewis tweets about anything related to Steiner schools, even if a newspaper article merely mentions that a child from such a school got lost in the woods in New Zealand: “Undoubtedly the work of gnomes” (File “2013-12 [Dec]-09 at 10.09” of the Claimants’ disclosure). On republication Dr Lewis left the pre-settlement date on the article and did not highlight that to his readers. His statements now not only consisted of false balance, but specifically contradicted the public record, in complete denial of any facts of the matter continuing also to state that we were very angry with anyone who is critical of Steiner schools who does not make our story the “centre of discussion” and that we subjected them to harassment and attacked them as a result of that frustration, all of which he knew was incorrect as we were fighting a substantial campaign of misrepresentations and smears. Yet he felt very confident to re-publish these misrepresentations in order to further provoke us. In fact, all we ever wanted to do was being able to contribute to the debate, as we had been before our personal experience with the Byngs.

88. Dr Lewis also posted comments on his blog indicating that we were harassing him and his followers and supporters and that we were intent on destroying his reputation by only giving a partial account of events. None of this was correct. Moreover, that same post

stated that we had sent him a threatening email and that he was to make our harassment of him known to the public. Again, we had in no way harassed Dr Lewis by asking him to publish correct information about a matter of obvious public interest. All we tried to do was to respond to his deliberate provocation of us by engaging with him politely and evidentially, but this statement of his only served to further create a bad reputation for us. This image of us was adopted by his supporters and repeated and communicated to others online. Although we knew this was being achieved covertly, there was little we could do, and we began to realise that if we were to have any chance whatsoever of getting his misrepresentations corrected, we would have to go to the extent of global relocation of our entire family, as the Defendants clearly intended to continue in their course of conduct indefinitely and the gang they were fomenting was getting bigger all the time. Although his defamation was published from the jurisdiction of the UK, it was unconstrained by geographical boundary in its effect.

89. We have learned through these proceedings of the very large number of people who have been warned about us, including journalists and “all the big-hitters”, as well as the seriousness of the methods and smears. We would never have been able to prove it had we not relocated and issued these proceedings (“everyone who needed to know has been informed” (Tab 121), “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), “Will have to continue warning journos (Guardian etc).” (Tab 52), “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 104), “I imagine Angel coming after me for warning journos off her project and causing the WC [Waldorf Critics] to abandon her” (Tab 76), “I’m certain they’d threaten me with libel if they had evidence I’d warned anyone” (Tab 143), “[Andy] knows most of the big-hitters so he has put out a warning” (Tab 112), “Just remember - there are lots of people who know about this now and they will tell each other.” (Tab 85))

90. The specific tactic of publishing provocative misrepresentations about our legitimate interests and agency, denying us any right of reply, and then using covert and proxy means of spreading personal smears to justify that behaviour and recruit others into it has been used since the beginning and Dr Lewis' publications use the same methods. Our Steiner case was openly misrepresented, whilst falsehoods were also covertly spread about my mental health. These joint techniques allowed us to be excluded from what was being presented as an open debate "in plain sight". Although we knew that this was happening, the stress of being so trapped and not be able to address it, as we were widely banned from the individual blogs and places where we were publicly "discussed", and either shunned or vituperated in public discourse was tormenting.
91. The high level of covert interest in everything about us, including stalking our whereabouts, is even more distressing given the extent that the defendants and their supporters had gone to to make sure that in public we were starved of "oxygen" of any attention. "let them scream into the void" (Tab 46), "no one is reading her except perhaps Sune" (Tab 148) "no one is listening" (Tab 46), "no one is listening to her (Tab 131), "a) no one is reading her [...] c) no one is reading her [...] e) as above" (Tab 186). It's clear from their emails that the Defendants took immense pleasure in imagining how the effects of their actions would drive me mad, thus making it easier for them to tell people of the "clinical diagnosis" concerning my mental health. Obviously, this was extremely distressing for myself and my family as these techniques made it progressively harder and harder to prove what was happening. Mrs. Byng's emails show how delighted she was that her own hard work on character assassination in the background was bearing such fruit and that no-one could identify the origins in her own, and her husband's actions. ("She can't mention me because I haven't written anything she can point to." - Tab 104).
92. Our only aim was to take part in what was being advertised as an "open debate", on a subject of significant public interest in which we had experience and agency. Our central concern was the unchecked pedagogically influenced bullying. Our contention with Dr

Lewis was that he should not defame us against the public record as a method of personal harassment and provocation of us as well as maliciously spreading covert smears and then misrepresent any and all attempts to correct the misinformation about us, as harassment of himself and others. Also that he should not hide practical agency for bullied children while on a platform of supposed support for their welfare; he was also approaching journalists as an expert, promoting himself, and claiming that no-one would take on Steiner as it was too much work. We were denied any right of reply, although he had told us to go and publish on our "own platform", the documents produced in these proceedings have revealed how complicit he was in making sure that our ability to publish was also actively sabotaged ("getting a full translation on a UK blog with some profile (coughs) would neutralise them. And make them hopping mad" (Tab 140 of the Defendants' disclosure)).

93. In April 2013 we relocated back to the UK. We did not have very long due to the statute of limitations and so in spite of having to deal with the pressures of the relocation itself, we were forced to begin to address the matter almost as soon as we landed.
94. We attempted to further resolve matters with Dr Lewis on 1 May 2013. Due to the extreme upset and distress his comments were having upon my family and we felt it necessary to indicate the seriousness of the matter by preparing a pre-action letter of claim to Dr Lewis. We expressed our willingness to participate in alternative dispute resolution to see an end to the matter. However, despite us recognising and highlighting to Dr Lewis the influence he could have to help bring an end to this matter, he did not respond and we had to consider that he had filtered us. Fearing to get suspended from Twitter again by involving third parties, we couldn't be sure he had received it.
95. Given that Dr Lewis had ignored our attempts to resolve this matter, we attended a widely advertised talk being held by him in Bath on 14 May 2013 and quietly tried to hand him a further copy of our letter of claim during the interval, that is, after the talk but before the

questions and answers section. We openly videoed this with a mobile phone, as we were sure it would later be misrepresented. Dr Lewis then announced to the room of approximately 20 people that he would not have anything further to do with “these people” and stated our presence as a reason to cancel his questions and answers session, even though he’d already done the whole talk with us sitting there. On leaving the room, Dr Lewis pointed his umbrella at my husband and I and stated that we represented a predatory criminal danger to children by saying: “If I ever see you anywhere near my family, or anything like that, I will call the police”. This once again caused us to feel distress and great embarrassment at being falsely portrayed as criminals.

96. Following his departure, a member of the audience spoke to us and expressed her concern by the last sentence Dr Lewis had uttered before leaving. She told us that due to her work, she recognised the serious implication of those words. Furthermore, one of the organisers also spoke to us and expressed his disappointment that Dr Lewis chose to leave rather than deal with and resolve the matter publicly.
97. Following this meeting, Dr Lewis posted a defamatory Tweet on 15 May 2013 stating “Shame some odd and disturbing people in the world cannot understand that I want nothing to do with you”. It is clear that this comment was intended to be hurtful and provoking and it did indeed reignite the feelings of hurt and embarrassment felt at the talk the previous evening. The clear mental health slurs and defamatory personal labelling that Dr Lewis peppers any discussion of me with, show that he was on board with what Mrs Byng claimed to be a “clinical diagnosis” of me that her husband had done following the phone call about LDN (“Andy Lewis and I both think it’s a borderline personality disorder. Richard [...] didn’t disagree” - Tab 119). His disclosure shows that Dr Lewis consistently described me in criminal terms, always smearing our mental health and emphasising dangerous criminality (“they are dangerous serial stalkers” - Tab 176). Our only interest in Dr Lewis has been in regard to subjects in which we share a common interest and our growing concern with his lack of democratic principle. We have absolutely no personal

interest in him or his family whatsoever as he knows perfectly well.

98. Nevertheless, for the following days, Dr Lewis continued to post defamatory, hurtful and deliberately provocative posts on his Twitter account stating on 20 May 2013 “Thank you, most Angels will be welcome. The fallen Angels of harassment will not.” It is clear that this Tweet was intended to refer to me given his previous false accusations that I had been harassing him and as my first name is Angel. He was clearly provocatively demonstrating his ability to enlist others in harassment of us through misrepresentation. The Defendants have a large amount of supporters, largely due to their platform on Steiner Schools and on other subjects of interest to skeptics. As such, and due to exploiting their followers’ trust and belief (that they would never behave in the manner he has), the defamatory views and remarks about us have gained prevalence and proxies have made unsolicited approaches to unconnected others, such as Press Agencies and feminist organisations, warning them not to have any involvement with my husband and I. One of the most active proxies wrote “if you don’t give [*Angel Garden*] her own way, she’ll make a nasty vid about u and post it on youtube...” The press agency in question then blocked me.
99. Others confirmed that we were not welcome at talks and that we would be treated as hecklers due to these misrepresentations.
100. For example, because of what Dr Lewis must have told the BHA about us, we were not allowed to attend a talk organised by the BHA, on a platform of Human Rights, where Dr Lewis might risk being politely questioned by us (disclosure revealed that based on the personal smears Dr Lewis told the BHA, they had apparently informed the police on the off-chance that we would've turned up: “Richie is right on the money and will notify the police before the meeting” - Tab 218). We were absolutely clear with them, that we only wanted the same rights as anyone else and would guarantee impeccable behaviour, but we were still denied access. His disclosure reveals that he was not above achieving our

shunning by threats, simply stating that he would refuse to speak if we were allowed in.

101. Claims that we were trying to extract money from Dr Lewis appear to have their root in his disclosure as he told Richy Thompson of the BHA in an email that I had threatened to sue him unless he gave us money to go away which he knew not to be true ("her demands for me to give her money to go away against the threat of a defamation case" - Tab 224). Not only was this a simple lie, but his disclosure has provided no evidence of any such "threat" whatsoever and our communications show us allowing that he had been misled and trusting that he had significant power to sort the situation out.

102. During the Summer of 2013, mindful of the over-riding objective of avoiding legal action, we again made every possible effort to resolve the situation through pre-action correspondence with Dr Lewis, again requesting ADR. His solicitor, Robert Dougans, told me that ADR could only be considered when he had more details of the words complained of. We provided the requested information but heard nothing for months, and had to issue the claim due to the statute of limitation. Once served, we immediately asked about ADR yet again, in a phone call to Mr Dougans but he said we were "way beyond that point now". He also stated at the start of that conversation that we had done some quite good things as educational activists which means he knew perfectly well that we'd achieved the settlement, all of which we found distressingly contradictory and confused us as to how this approach could be designed to avoid legal action.

103. We were also alarmed and distressed to note that Dr Lewis' platform had been promoted in other jurisdictions and publications such as the Guardian newspaper, based on his expertise on Steiner. Within the newspaper article on 4 December 2013 there was a link to Dr Lewis' Quackometer blog, thus causing potentially hundreds of thousands people to come across the defamation of the settlement, and unfair, defamatory and unfounded comments made against my husband and I. On writing to the Guardian, I was first responded to as though I had been complaining that my own case had not been reported,

which I had not, “I’m sorry you felt that your situation wasn’t covered in the piece” (File “2013-12 [Dec]-16 at 16.48” of the Claimants’ disclosure). This just echoed the “all about them” narrative and was a misrepresentation as I had actually flagged up the 1st Defendant’s defamation because the Guardian was promoting his blog i.e. sending people to his site. When I tried to point out that I had not been seeking any coverage of “my situation”, my email was blocked by both that journalist and her editor.

104. As of December 2013, we understand that Dr Lewis’ Steiner articles had been viewed 250,000 times and more recently he stated that he receives upwards of 10,000 visitors to those articles each month.

105. Around the 28th of February 2014, Alicia Hamberg proceeded to delete all the attacking threads she had written about us, including, but not limited to those entitled “the steiner/waldorf free school question (once more)”, “comments (LSN)”, “hey!”, “angel garden”, “change”, “angelic disharmony”, “grégoire perra”, and “standing up, falling down”, removing any trace of the vicious attacks we had endured on her site for years.

106. The obfuscation of unchecked bullying referred to in his 2012 post, in para 69 above with regard to the 1st Defendants’ own writings occurred significantly again later in January 2014, when the BHA published their Briefing about their concerns with Steiner schools without mentioning the issue once. When this was investigated, they claimed no interest whatsoever in the subject. A few months later, however, in July 2014, the subject of unchecked bullying received an unexpected boost when a BHA’s Freedom of Information request revealed that parents had written in before the free schools were established, with serious concerns about racism and unchecked bullying in those school, and although it was a great discovery, occasioning a feature investigation on Newsnight, the BHA stated to the nation that it was also exactly what they had expected to find, having been worried about it all along. The BHA had, however, only a very short time before this broadcast, absolutely insisted to us that unchecked bullying was not connected in any way to Steiner

pedagogy, and in any case irrelevant to state-funded Steiner schools. They said it was not something sensible parents would need to make an issue about.

107. Our request to Richie Thompson, asking the BHA to account for these anomalies in their position was forwarded to the 1st Defendant during these proceedings. It was then presented to us by the Defendants as a letter their solicitors had directly received “from the BHA”, when in fact it was an email from us to the BHA forwarded to Andy Lewis. This misrepresentation was used to assert that our investigation and publication of the BHA’s inconsistencies was proof that it was “all about us”, when in fact our case was hardly mentioned at all, except as one of a string of examples.

108. I understand that the 1st Defendant’s blogpost is still accessible online to date and appears top in a Google search of mine and my husband’s names, along with/ followed by similar personally victimising blogs by another skeptic and humanist proxy harasser. As so many of the Defendants’ misrepresentations are now so easily reproduced by third parties, including repetition of much of Dr Lewis’ defamatory statements in further personally targeting posts by this proxy, who was openly thanked by Mrs Byng for “tackling it head on”, our reputation, and thus our earning potential was practically controlled by this gang. Moreover, this meant that Dr Lewis’ claim in the defence of low numbers reading his blog post, is entirely misleading when the proxy’s post has been viewed over 15,000 times (as of February 2015).

109. These further publications have been widely disseminated by proxies on behalf of the Defendants causing Mrs Byng to thank her effusively both openly on that blog and privately by email saying: “At least when someone googles her the thinkhumanism site appears - she can’t erase it.” (Tab 227 of the Defendants’ disclosure).

110. Disclosure has revealed a long string of lies spread by Mrs Byng to many people including other Steiner critics, skeptics, filmmakers, journalists and countless others. These include claiming that I’m an astrologer (which in skeptic circles is a death knell to be taken

seriously) (Tabs 28, 58, 75, 80, 115, 132), that Steve is a pornographer (Tabs 58, 184, 222), that I am slovenly (Tabs 121, 206), that Joe had barely any food to eat (Tabs 28, 75), that Steve fleeced Joe of some/all of his money (Tabs 28, 75), that the comedy feature film I had made about alternative medicine was actually a documentary (another way to persuade skeptics to distance themselves from us) (Tabs 43, 75), that I probably sued the hospital that kept my premature baby alive and made a documentary about that (Tab 75), that I'm not disabled and hammed it up to get a blue badge (Tabs 117, 184), that I'm obsessed with and have links to the Illuminati (Tabs 54, 56, 60), that no one liked the one-woman show I did about Florence Nightingale (Tab 206), that we've barred Steve's parents (Tabs 30, 61), that my mother wasn't really dying of cancer (Tab 35), and that I'm mentally ill, unstable, suffering from borderline personality disorder, threaten to harm my children - using her husband's credentials as a mental health professional to back this up (Tabs 47, 69, 73, 48, 227). She also spread the shocking and utterly false notion that I "was making it very clear that [I] expect ex-Steiner parents to use their own identities to 'whistle-blow' re bad experiences at Steiner schools. If not, [I] feel pressure should be brought to bear on these families to 'come clean'" (Tab 75).

111. We had only wished to contribute to the Steiner debate, as they knew full well, and which if anything supported the views that they held themselves. From the outset, Mrs Byng had expressed great enthusiasm for our work and our shared views. It was greatly distressing, knowing the true root of their harassment of us, to be smeared and labelled by so many of Andy Lewis' and Melanie Byng's supporters as crazy, paranoid and delusional, sociopaths and that we were intent on ruining the lives of others, untruths which they appeared to easily convince others of using only the confirmation bias promoted by their labels of "evidence based skeptic" and "humanist" and including the presence of "open debate", and we continued to find it extraordinary that they would, using those respected labels, allow and facilitate these statements to be disseminated amongst their supporters (and even unconnected people) to the extent of being in direct contradiction of their publicly stated

positions.

112. It was extremely distressing to see through disclosure was how Mrs Byng manipulated the lies through her conversations, planting seeds and then letting the people she was communicating with run with the idea. For instance, she planted the idea that “she’s not walking impaired, she’s just fat” (tab 117 of the Defendants’ disclosure), leading Diana Winters to say “I’ll say it if no one else will... I doubt her claim to have a “mobility impairment” [...] They probably did as they always do, look for someone to blame and someone to sue, then get involved with a succession of doctors who probably failed to recognise her “severe disability” and they probably sued the doctors, appealing then to disability rights organisations, etc. to get herself somehow officially recognised as “disabled”. [...] I’m basing this partly on Joe’s comment that she didn’t really have an impairment, but it didn’t surprise me.” (tab 125 of the Defendants’ disclosure). On another occasion, Mrs Byng would suggest “let’s assume the mother is real” (tab 35 of the Defendants’ disclosure), and later on Alicia Hamberg would say “I’m still not sure that she’s truthful about her mother’s death” (tab 204).

113. Disclosure has clarified that, although she was quite aware that her actions in using her son’s stay as the hidden trigger for our total destruction showed she would rather “wreck their project than discuss it sensibly” [tab 30] Mrs Byng felt that coming clean with the truth “would have meant me withdrawing permanently from any online engagement, I imagine, and would have involved grovelling and apologising, and I don’t think we would have been any good at it. In fact it just isn’t something we would be able to do.” (Tab 85) and “that being conciliatory towards [the second Claimant] was to suggest that [Joe’s] experience was not valid, that his feelings could be sacrificed for the sake of hers.” (Tab 47) Mrs Byng made these statements to others, along with her many privacy invasions of private personal information, without ever making any effort whatsoever to check out her son’s accounts, or resolve any of her clear issues arising from her own initiatives, but nevertheless changing and embellishing her son’s accounts for added effect. In spite of

reassuring us, just before she broke contact that “we are still here” for us and our child, her true attitude was as she expressed it to Alicia Hamberg: “it should have been obvious to them that they had fucked up as far as we were concerned.” (Tab 85 of the Defendants’ disclosure).

114. Disclosure has also shown how the defendants and their friends have made us responsible for anything that was negatively happening to them, such as for example: if someone was making anonymous phone calls, it was us; if they received a strange email claiming to be from a private investigator, it was us; if someone was posting unwelcome comments, even though the IP address would clearly show the originator was not in the same country as us, it was, nevertheless, us.

115. The covert and proxy harassment has continued throughout these proceedings, even while we were attempting to settle the matter between October 2014 and January 2015. During that time, in November 2014, we had written an article on how a Steiner school dealt with a dyslexic child. This article was found by, Susan Godsland, an “retired specialist reading tutor” from Exeter, who apparently runs a website about dyslexia (www.dyslexics.org.uk). This article prompted her to follow our Steinermentary twitter account, and tweeted our article, adding Mrs Byng’s twitter name to that tweet. Very shortly afterwards, she deleted that tweet, unfollowed, and then blocked us as has happened so many times before.

116. On the 31st of December 2014, I publicised a different article, this time about the Medical Innovation Bill. I entered into a polite but increasingly terse conversation with someone who called themselves @FrozenWarning. Then, after hours of interaction, shortly after the appearance of a proxy, he “suddenly remembered” who I was, called me “a stalker”, that I had “nothing but disgusting behaviour”, and that I’ve been “ignorant and bullying for months”. This led a person called @FlatSquid to join the conversation saying I’m “fucking mental”, “obsessive”, that I “stalk online and irl [in real life]”, that I’m “an absolute nutjob”,

and that I “dedicate [my] life to obsessive behaviour”. He also said Steve was “just as mad”. He claims to have met me, although I have no idea who he is, and cannot verify this intimidating claim. Interestingly, this very same person said in November 2012 that “Andy was right. You’re one very troubled individual”, showing that he has based his view of my husband and I on what Dr Lewis has been spreading.

117. Although nothing we have written has been claimed to be false in the defence, the fact that we managed defend ourselves from this onslaught at all, through exercise of Article 10 rights to free speech, is made much of as being “demeaning” and “harassing”. Although Mrs Byng did express concern and even anxiety in her disclosure, it was anxiety and actual paranoia of being found out, which her friend Alicia often had to reassure her about, and at times had to bring her back to reality, as when Mrs Byng said “she thinks I’ve been gossiping about her behind her back, saying all sorts of nasty snobby things about her frozen pizzas and slovenly habits” and Alicia had to reply “well, you have!!!” (Tab 121). Nevertheless she always rejected any and all suggestions that she should simply deal with the problem that she and her family had caused, even when her friends suggested that. Those who didn’t join in with the narrative of rejection and victimisation of us, were reprimanded and further leaned on “I don’t know that Roger’s quite got the implications of A and S and their links with the ILLUMINATI”, “You see my last email. I felt he had to take some responsibility. R[ichard] says he’s just being bloody-minded - takes a bloke to know a bloke” (Tab 56 of Defendants’ disclosure)

118. Since then, not knowing of the extent of Richard Byng's collusion in spreading mental health smears, and not having access to the proof of the substantial covert and proxy stalking and harassment, (which disclosure having now provided it, only goes to show the truth and accuracy of every one of our publications) we actually paid a substantial sum of money to take Dr Byng and the harassment claims out of the case. Following months of further attempts to resolve matters through ADR, starting immediately after disclosure and in spite of being further harassed during that period of mediation as described above, we

were then unable to re-introduce the covert and proxy harassment claims due to lateness.

119. Nevertheless these recent instances, among others, of the Defendants harassment of us and their defamation about us, our children and the Titirangi Settlement, continue to cause anxiety, and distress for our whole family, even nearly two years after our relocation and there is absolutely no sign anywhere of any intention on their part but to continue to harass, defame and victimise us in this manner, and they have pointedly not even denied this in their defence.

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

Signed:

A handwritten signature in black ink, appearing to read "Cheryl Gaden". The signature is written in a cursive, flowing style.

Dated:

16.2.15