IN THE HIGH COURT OF JUSTICE APPEAL COURT REF. No

QUEEN'S BENCH DIVISION

ADMINISTRATIVE COURT

BETWEEN:

Farid El Diwany Appellant

AND

Solicitors Regulation Authority Respondent

SKELETON ARGUMENT OF FARID EL DIWANY

1. By their Judgment dated the 17 January 2020 the Solicitors Disciplinary Tribunal (SDT) struck me, the Appellant, off the Roll of Solicitors.
2. This SDT punishment was a wholly disproportionate response to the perceived offences which took place in Norway in 2001 and 2003 and which would certainly not be offences in the United Kingdom, given that the catalyst for the inappropriately labelled 'offences' was Norwegian Press religious hatred of a fundamental and perverse nature and earlier criminal conduct (by my accuser Heidi Schøne) all of which was started by Heidi Schøne's fabricated comments to the Norwegian Press which the Police did not believe. The fact that the Kingdom of Norway did not officially recognise the racist character of the criminal conduct of Heidi Schøne and the Norwegian Press from its inception on 24 May 1995 and onwards that provoked me to exercise my rights to freedom of expression and information does not entitle the SDT to ignore those sustained attacks of mine as criminal in nature - as the Essex Police and the Metropolitan Police have both declared that criminal offences had been committed in Norway against me, which were directly related to my defence of justified comment for which I was charged in Norway with harassment and given two convictions. There is a clear conflict of laws. The SRA preparation for this case was sloppy and ill-informed.
3. The SDT have made fundamental errors in failing to take into account basic aspects of my evidence which was before them. There was most certainly plentiful good cause and exceptional circumstances to look behind the convictions. This will be detailed below.
4. May I first correct certain misinformation given by the SDT in the 'Factual Background' in point 3 of the SDT Judgment. I qualified as a Solicitor on 1 September 1987 and Sir John Donaldson, Master of the Rolls, signed my Certificate. The SDT put that I qualified in 1990. My employment as a Solicitor was far more extensive than as recorded in point 3 by the SDT. My first role as a Solicitor on qualification was with Hart Associates in Portland Place, London W1 from 1987-1988. From 1989-1998 I was the Commercial Property Solicitor for the Port of London Authority and once I had sold all their non-operational land the job ended. I then entered private practice where I was a locum from 1999-2010. As a locum I worked for 22 separate law firms of which Scott & Co. were only one. I became a locum to have the time in between assignments to battle Norwegian Press vilification, some of which vilification I was

assured by Detective A.M of the Metropolitan Police in 2019 would have been prosecuted by the Police and CPS had it been the British Press printing the same story. But the British Press would never do what the Norwegian Press did as the British Press, for all their faults, have considerably higher ethical standards. Indeed, the Essex Police have been in touch with Interpol in 2006, 2013 and 2019 in connection with a 2005 hate-crime committed in Norway against me – the catalyst for which was the Norwegian Press and the criminal conduct of both Police Sergeant Torill Sorte in Norway and registered mental patient Heidi Schøne. These facts were presented in some detail to the SDT but curiously were not mentioned in their Judgment. A serious omission. In point 4 of the SDT Judgment regarding Gawor & Co. it would be more accurate to say that I only told Mark Gawor of my so-called criminal convictions from Norway after my mother had died when I was incredibly depressed. My mother had been subjected to severe harassment by a bent Norwegian Police Officer called Torill Sorte from 2002 to 2016 and she died without being able to get justice. We had both been fighting through the use of lawyers and the Essex Police and Lord Pickles to get justice with no success. It broke my heart to see my mother's health deteriorate at her seeing me suffer so much at the hate-crimes committed against me in Norway. When my mother died I gave up working as a Solicitor after one final brief stint with a London West End firm of Solicitors. Mark Gawor very relutantly dismissed me for my moment of madness in telling him of my (manufactured) convictions due to my depression over my mother's death, but in truth I was leaving the firm anyway to seek recovery time after my mother's death. But for the abuse we both got from Norway my mother might still be alive today. It was an horrendous end to her life. All these aforementioned facts were known to the SDT, but of course they don't give a damn. Mark Gawor declared to the SRA in a letter that the standard of my work and professionalism was “first class". He never knew of the severe abuse I was receiving from the far-right Norwegian Press. He does now as I have sent him in 2019 a copy of my book and the material declared as a hate-crime by the Essex Police. With regard to point 5 of the SDT Judgment I did not report the two convictions to the SRA - as convictions based entirely on xenophobia, Islamophobia and racism are not worthy of being reported to anyone. These ‘convictions' should not be given any oxygen in the U.K.

5. One conviction in Norway in 2003 was for my website called **www.norwayuncovered.com** or alternatively by the name of www.norway-shockers.com which criticised my two abusers - Heidi Schøne and Torill Sorte as well as defects in the Norwegian legal system (no recordings made of civil trials therefore no transcript can be obtained; cross-examination forbidden and disclosure of evidence prevented if it is “in the best interests" of the defendant). And I am a quasi-expert on the Norwegian legal system. My offending website is an Article 10 ECHR right. If my accuser Heidi Schøne, registered Norwegian mental patient at the Buskerud Psychiatric Hospital, tells the Norwegian Press that I am a potential child-killer, and a potential killer of her and a potential killer of her neighbours all on her own uncorroborated word which her press then print then I DO have the right to deny this by setting up a website. No evidence was provided by Heidi Schøne to the Norwegian Police as to my alleged letter she said I wrote to her in 1986 threatening to kill her two-year-old son. This was because I never wrote any such letter in the first place. I adored her son, Daniel. He liked me very much too – his father had abandoned him. No neighbours came forward to say I had threatened their lives – as repeated for 11 years in the Norwegian Press and on Heidi Schøne's direct information given to the Press. This is criminal behaviour from Heidi Schøne that deserves to be exposed on a website. Her sex-life was a small part of it – but the Press described me as a “sex-terrorist” so my response was proportionate.

6. A fundamental error was committed by the SDT in paragraph 8 of their Judgment when they said: “The Tribunal carefully considered all of the material provided by the parties but did not review the book and website, save where extracts had been included in the hearing bundle by the Respondent. The Respondent was given the opportunity to introduce specific documents he considered to be relevant but the Tribunal did not consider it appropriate, in accordance with its directions on disclosure and preparation of the bundle or fair to the Applicant for such extensive material to be incorporated by passing reference.” How convenient! The whole crux of my case is ignored on a feeble excuse: there was too much material to read on my website! In fact I made more than a “passing reference” to the material that needed reading: on page 127 of the Caselines Bundle, being my email to the SRA's barrister Inderjit Johal dated 7 September 2019 I said in point 2: “Heidi Schøne's 1995-1998 newspaper claims that the ‘sex -terror’ began the moment she returned to Norway in 1982. All the newspaper articles are reproduced on my website on the ‘Muslim man’ link.” It would have taken the SRA and the SDT Panel 10 seconds to find this ‘Muslim man' link on my norwayuncovered.com website. Mr Johal had known for three months about my book and website and this ‘Muslim man’ link and I repeatedly told him in email correspondence and in phone calls to look at the book and website. There was 35 years worth of material condensed into one book (free to download on my website). I asked Mr Johal repeatedly to tell me what on the website would get me a conviction in the U.K for ‘harassment' of Heidi Schøne on the assumption she was transposed as a U.K citizen and subject to the laws of this country. Mr Johal refused to tell me. He provided no evidence from the British Police or CPS that I would have committed a criminal offence in this country due to the publication of my website. I have no written confirmation from Mr Johal that he looked at my website. I posed the same rhetorical question to the SDT Panel at the Hearing: there is nothing on my website that would get me a conviction in the U.K for harassment of Heidi Schøne. It was ESSENTIAL that the SDT Panel look at the actual website. (The devil is in the detail). They refused. And be in no doubt it was the website that got me a conviction in Norway for ‘harassment' of Heidi Schøne, due to its massive nationwide viewing figures. (Even the Norwegian Minister of Justice Odd Einar Dørum was interviewed about it). A website along with my ‘public information' campaign giving my side of the story on Heidi Schøne's preposterous allegations that SHE gave to the Norwegian Press and they printed. Which included a resumé of her life history in response to her sick version of my life history which she gave to the Norwegian Press. Tit for tat. Quid pro quo. Why did I incorporate the newspaper articles on my website by way of reference in the SRA Caselines Bundle? Because there were twenty articles in Norwegian with separate English translations and reading them with an enlargement facility on the internet would make for very easy reading as opposed to downloading forty articles (Norwegian and English) in a print size that was too small to read and putting it on Caselines and the SRA Bundle. The SRA/SDT should have told me BEFORE the Hearing that if they insist they need the articles to be printed off and provided then I would gladly have complied, but it would have involved a good few hours work. But the articles would have been very large A3 Norwegian language extracts, save for the translations. Refusing to read this evidence is akin to a Tribunal refusing, by analogy, to read the written confession of a murderer which thereby absolves a co-accused from a life sentence. The SDT Tribunal even objected to me reading out the most egregious newspaper article on me as I had already left the Witness Box. Even a judge at the Old Bailey would not have been that fastidious. I did not have £15,000 to instruct a barrister to represent me and to follow the rules to the letter. Fluid rules.
7. The SDT said in paragraph 11.51 of their Judgment: “The Respondent's anger appeared to have been directed [at] Ms H who had not herself published anything.” ‘Ms H' was short for

Heidi Schøne, my accuser. But she is not a newspaper proprietor: therefore she cannot publish anything herself. What she did do was pass on her ‘truths' to the national press who printed her information. These ‘truths' were sick fabrications of such a perverse nature that could only come from someone with criminal motives of trying to pervert the course of justice. The SDT, if they had read the articles, should then readily conclude that Heidi Schøne was a pathological liar whose motives had nothing to do with the SDT's argument that she was an unfortunate woman with ‘vulnerabilities and personal difficulties’ none of which the SDT seemed to think were of her own making. So here is a list of her accusations that were printed in those newspaper articles from 1995-2006.

- In Bergens Tidende of 24 May 1995 I was labelled 19 times as the ‘Muslim man' in association with my suffering from ‘an extreme case of erotic paranoia’, as I “imagined” Heidi Schøne loved me. See her passionate love letters to me from 1982-1985 on Caselines in one of which she herself broaches the subject of marriage. I did not ‘imagine' she liked/loved me. She did love me for quite some time. We kissed and cuddled every time we met in England. I did not have sex with her. She was, moreover, recovering from her second abortion to the same Norwegian man, after still being at school. I abhor the use of abortion as a contraceptive. Heidi Schøne told the Press she never had “any feelings” for me and in another Press article that we met twice in England “for a cup of tea". That the moment she returned to Norway in 1982 the ‘harassment' began. Clearly a deliberate fabrication. That from 1982-1995 I had continuously ‘harassed and threatened her with her life'. That she had ‘secret addresses’: a lie. She was at the same address the whole time. That I wrote obscene words on her door that were ‘unprintable'. That I am ‘insane'. All solely on her own uncorroborated word. Not a shred of evidence was provided by her to the Norwegian Police to corroborate these ‘truths'. Indeed the Police told me they did not trust her or believe her: Police Officer Svein Jensen from Nedre Eiker. See the Caselines transcript of 1996-1998 recorded telephone conversations. I got my own back the minute I discovered in February 1995 her false allegation to the Norwegian Police that I had ‘attempted' to rape her: my ‘reports' from April to May 1995 plus my letter dated 7 April 1995 as quoted on page A60 of the SRA Bundle. I would never in a million years attempt to rape anyone and I regarded such a heinous allegation as a criminal offence designed to try to ruin my life. What so incensed me was the treachery of it all, after she told me in some detail when I went to see her in Bergen at Christmas 1984 about the time she was allegedly raped by a Bergen shopkeeper after an all night party, who was not an indigenous Norwegian and she reported him to the police but they took no action; then she told me that when she went to Rhodes in 1982 Greek men tried to rape her at knife point after taking her and a girlfriend in a jeep to the beach. That when she refused to have sex one of them put a knife to her throat upon which she said she was on her period. The men then asked her to prove it, which she proceeded to do. Whereupon they gave up and took her back to town. It did not stop her having sex with two different men on the beach as did her friends as they were “attracted to them" she told me. Next she told me a cousin of hers had been raped and killed in Norway. So with all this does anyone seriously imagine that I would then attempt to rape or actually rape her myself? Luckily the Norwegian Police never questioned me. But how was I to know I would not be questioned, arrested and placed on remand on the several occasions I visited Norway in the 10 year period before I discovered the allegation? Note that in Cyprus this January Freya Heath from Derby was convicted

of the criminal offence of public mischief for falsely alleging to Cypriot Police that she was gang raped by 12 Israeli men. She avoided a custodial sentence following representations by the British government. A custodial sentence should have been given to Heidi Schøne for her blatant attempt to pervert the course of justice. Twelve years later in 1997 she decided that I had instead 'raped' her by 'holding her down'. For someone who had made two previous allegations of actual rape against separate men in the early 1980's she knew perfectly well the difference between 'attempted' rape and 'rape'. The 'attempted' rape allegation was made in 1986 a mere two weeks after I wrote and told her father she was sleeping with one Gudmund Johannessen who was injecting heroin which he'd purchased in China on a two week holiday. The lovers each had two AIDS tests: negative results. They were both sleeping around having unprotected sex. An untrue allegation of 'attempted rape' was made to the Norwegian Police in revenge for my telling her father she was at risk. WIn 2001 the Norwegian Press in Drammens Tidende printed that I am a possible rapist and sent a copy of the allegation to the Brentwood, Essex Police via Interpol along with a summons for me to appear before the Norwegian Magistrate's Court on UNSPECIFIED charges of violating Section 390(a) of the Norwegian Penal Code. I had no time at all to prepare and did not go. I was also sent a letter from Mrs Schøne's psychiatrist saying that she will not be attending the trial. So if no cross-examination could take place of Heidi Schøne there could not be a fair trial. No point at all in my going. I was convicted in absentia. The hearing was due to take place just three weeks before my civil libel claim in Norway. A conviction, if given in Norway, which was timed perfectly to sabotage my civil and criminal claims. The charges related to offences allegedly committed in the period 1995-1998 so why not charge me in 1998 or 1999? The 2001 charge WAS probably out of time and should have been laid two years earlier. But two years earlier I was not yet in a position to bring my civil and criminal claims against Heidi Schøne so the Norwegians had no legal proceedings to sabotage. When my lawyer Harald Wibye arrived at the Court Heidi Schøne was not there as she thought I would be attending. So the Magistrate adjourned the case to enable Heidi Schøne to be told I had stayed away thus enabling her to attend her own prosecution. At the 2001 Magistrates Court hearing Heidi Schøne tells the Magistrate who then records it in her verdict that her allegation of "rape" was "not made in order to provoke the Defendant but was made because such an assault had taken place". Heidi Schøne omitted to tell the Magistrate that it was on the record that her original allegation from 1986 was categorically "attempted rape" as recorded by my Norwegian lawyer Helge Wesenberg in his 28 February 1995 letter to me a copy of which was given to the SDT Panel. It was immediately after receipt of my lawyer's letter that I wrote to Heidi Schøne on 7 April 1995 expressing my disgust with her on learning of her false allegation of attempted rape: the SDT produced this letter in paragraph 11.5 of their Judgment without explaining the reason for it being written. I told the SDT why at the Hearing. It was a private letter. The SDT have misled the public by making them think this letter was unsolicited abuse. I called Heidi Schøne a 'Christian pervert' as she had betrayed her supposed born-again Christian values by her appalling lies to the Norwegian Press. My own mother was born a Christian and I am not in the business of accusing the Christian faith of being for perverts. I attended a Church of England Primary School and loved every minute of my five years there. Similarly, the SDT deceived the public by reproducing my letter to Heidi Schøne from November 1997 as per paragraph 11.5. I had told the SDT that I wrote that letter the moment I was

told by Police Sergeant Torill Sorte that Heidi Schøne, after 12 years, had changed her allegation from one of attempted rape to actual rape AND had insisted to Torill Sorte that I had written a letter to her saying I would kill her son (when he was two). Plus the evil lies she had told the Press in 1995. But she had 'killed' her own unborn children by way of two abortions – so in a private letter I reminded her that in falsely accusing me of wanting to kill her son it was she who had in fact 'killed' two of her own soon-to-be children. She was a de facto 'killer'. No such letter threatening to kill her son was ever written by me. I did NOT attempt to rape her. Hence my condemnation of Heidi Schøne in those two letters reproduced by the SDT. Such letters would not get me a conviction for harassment in the U.K. In 2002 in the Drammen Civil Court Heidi Schøne's lawyer refused to give me her Witness Statement made to the Bergen Police regarding her allegation of "attempted rape" because he said it "prejudiced her case" of the (newly invented) allegation of "actual rape". I told her lawyer, Mr Vegaard Aaløkken, that he was under a professional duty to disclose this evidence even if it did prejudice his client, Heidi Schøne's case. As it would in all probability clear my name. But at the same time it would result in a prosecution of Heidi Schøne for attempting to pervert the course of justice. So my request for disclosure was refused by Vegaard Aaløkken with the added comment that in Norway the civil procedure rules did not oblige him to hand over the document if it was not in the "best interests" of his client. This did not stop him calling me "a rapist" throughout the 2002 libel trial. I asked him in open court in what way did Heidi Schøne's Witness Statement prejudice her case? He refused to say. The judge whose command of the English language was not fluent refused to compel Mr Aaløkken to explain. How convenient! For the next 10 years the Bergen Police refused to send me the document. Eventually they said it was 'lost'. So there we have it: Heidi Schøne's intention was to get me a prison sentence for rape in Norway. As I certainly did NOT rape her or even attempt to then her intention was to pervert the course of justice. That is why I disclosed her life history (sexual aspects too) to the public in Norway: she was a criminal delinquent whose additional allegation that I wanted her two year old son to die by my 'threat' to kill him was why I thought it was in the public interest to disclose her life history. Indeed she had killed her own defenceless unborn children in the womb. She was in fact a cruel killer of what would have become living human beings – had time just run its course. The British Press print life histories of a sexual nature all the time. And libel barristers such as George Carman Q.C whose barrister girlfriend, Karen Phillips, was in the year above me at law school, always introduce sexual evidence in libel trials/proceedings whenever they can. In the 2001 Magistrates Court case, similarly, disclosure of the two Witness Statements of Heidi Schøne from 1986 alleging 'attempted' rape and from 1997 alleging 'rape' were not disclosed. An unfair trial.

- The Verdens Gang newspaper of 26 May 1995 had a front page heading of: '13 years of sex-terror'. That for thirteen years I had "sexually harassed and terrorised Heidi Schøne". That I "terrorised her friends and issued death threats"; In 1982 began thirteen years of "fear and sex terror"; that "When the half-Arab Muslim man was rejected by her later on, he started with obscene phone calls, death threats, threatening letters.... and harassing her friends for years and years." That: "Psychiatrists think the behaviour of the Englishman possesses all the symptoms of erotic paranoia: the sick person is convinced that another person is in love with him or her." That: "It didn't help moving to a secret address and getting a secret telephone

number.” That: “Me and my family were threatened with our lives". That: “At one point he did obscene things while I had to watch”. And: “He said I and my family would be killed". Professor of Psychiatry Nils Rettersdøl then went on to discuss the affliction of erotic paranoia. The word ‘Muslim' is mentioned three times and ‘half-Arab' twice.

- The Drammens Tidende newspaper of 27 May 1995 said in a front page article: ‘Badgered and hunted for 13 years.' That: “For thirteen years an insane man has been making obscene telephone calls ... has sent Heidi more than 400 obscene letters and threatened the lives of both Heidi and her family". I was described as “insane" several more times and once as “half-German, half-Arab". A derogatory term. That I have “vandalised the neighbours' doors"; That: “Heidi, her family and friends have all been threatened by this man who has also threatened to kill her nine year old son. In 1988 Heidi was sent funeral cards by the man who told her ‘her days were numbered’. ... Heidi knows the man's mother has tried to commit him to a mental hospital”. All a pack of lies. And all Heidi Schøne's uncorroborated word, coming from a registered mental patient.

8. In 1998 the national newspapers did repeat stories: Verdens Gang said I was “sex-crazed ... making death threats ... harassing her friends ... half-Arab ... Her life of hell began when she returned to Norway [in 1982]... on one occasion he forced her to watch whilst he did obscene things ... the Englishman has sent 300 letters to Heidi Schøne so far this year” [Almost one a day! This allegation was withdrawn in 2003]. That I may suffer from “an extreme case of erotic paranoia...”. Drammens Tidende wrote that I was “mentally ill ...[sending Heidi] 300 letters this year ...the man has previously threatened neighbours of the family with lethal force to know where they have moved". Articles in a similar vein carried on until 2011 when the story of mass-murderer Anders Breivik took over. The stand-out articles were from Dagbladet on 20 and 21 December 2005 when in addition to the usual allegations of my insanity Police Sergeant Torill Sorte was quoted as saying that: “for two years in 1992” my mother had me committed to a U.K Psychiatric hospital and “when he came out he carried on worse than ever". Heidi Schøne was quoted as saying that I “wanted her young son to die ... and in other countries such a serious threat would be severely punished". Total fabrications as I have conclusively proved. Even Police Sergeant Torill Sorte's interviewing journalist Morten Øverbye told me in a recorded conversation on 12 May 2007: “If she [Torill Sorte] says you have been in a mental hospital and you have not been in a mental hospital then she's lying. That's a no-brainer.” After all this pure filth printed on me in the Norwegian Press on information supplied by Heidi Schøne, then I had an absolute right to publicise Heidi Schøne's sexual past and life history. She was the epitome of evil; backed up by a demonstrably racist Press, who allowed me no right of reply. The SDT Panel are therefore perverse to state that striking me off was the only appropriate sanction and to say in paragraph 29 of their Judgment that: ‘...the Tribunal considered that his complete lack of insight heightened the risks set out above...’ which risks were: ‘The nature of the misconduct, both the convictions and the failure to report them, indicated a degree of continuing risk to the public on the basis that the Respondent considered himself beyond regulation; ...’. If I had been dishonest or fraudulent or beyond the pale in other proven respects then I would not have considered myself “beyond regulation”. But in this case where racist behaviour, backed up by a xenophobic State apparatus, confronted me there was no moral justification for me to report these manufactured convictions to the SRA or to apologise for my public information campaign on Heidi Schøne, an evil Carl Beech-like fantasist. For the SDT Panel to criticise me for leaving online my **www.norwayuncovered.com** website when they have not even looked at it is

obtuse. Their Judgment ruled: 'His website was still published at the date of the hearing. The Tribunal considered that the Public would be profoundly concerned by the misconduct and that the implications for the reputation of the profession were very significant.' Again, what on the website would get me a conviction in the U.K if my abuser Heidi Schøne were transposed as a U.K citizen? What the SDT Panel are saying about the public's 'concerns' is unintelligible, unsubstantiated and presumptuous. The public will be more concerned that a clear right to defend outrageous smears from Norwegian liars, cheats and bigots via a website is deemed illegal by the honourable members of the out-of-touch SDT Panel.

9. The SDT seem to think that in not naming me the Norwegian Press were somehow behaving honourably and protecting me and my good name. But many people in Norway did know it was me that was being written about as I knew many people there. Detective A.M of the Met Police told me that if the British Press wrote in the same terms as Bergens Tidende did on 24 May 1995 calling me Muslim 19 times they would be prosecuted.
10. In paragraph 11.6 the SDT mention my sending 'reports' in April to May 1995 to Heidi Schøne's neighbours detailing her past life. Very few of these were sent to her neighbours at this time but I sent them in response to finding out about her false allegation of attempted rape to the Police. I was the third man to be accused of sexual assault by Heidi Schøne and was furious for the trouble that this may have caused me if the Norwegian Police had taken it seriously. A few 'reports' to her neighbours in April to May 1995 did not result in a charge of harassment. It was AFTER the May 1995 Press articles that my 'reports' PLUS my side of the story in separate fact sheets began to be sent in earnest to third parties which produced the 2001 charges. If the Press had printed my side of the story in June 1995 my substantive campaigns would not have started. But by the time of the 2001 charges I was fully entitled to Article 10 ECHR rights to respond to the Norwegian Public with my side of the story to vile and false Press articles. The Norwegian Press disregarded their own Code of Ethics by not printing my response to the nation. So I did their job for them by my own information campaigns to the general public. The SDT deliberately ignored my obvious right to do this – as did the Norwegian Magistrates Court verdicts when giving me two convictions. It is called Article 10 of the European Convention on Human Rights – which does extend to Muslims. That my campaigns caused distress to Heidi Schøne was too bad. Does anyone think I myself was not very upset being described in the Press as a potential child killer, rapist, sex-pervert, registered mental patient over a period of eleven years?
11. Which brings me to the biggest miscarriage of justice in the history of U.K libel litigation: Mrs Justice Sharp's decision of 29 July 2011 in my case against Hansen, Sorte and the Ministry of Justice and the Police, Norway. And which made 'Gatley on Libel and Slander' and subsequent editions of the White Book. A Judgment which the SRA and SDT used to prosecute me. For the benefit of those still perverse enough to rely on that judgment as correct then let me disabuse them of the deception that was thrust upon them. On 20 and 21 December 2005 in Dagbladet national newspaper I made the front pages. On 20.12.05 the online version had the headline: 'Sexually pursued by Mad Briton' saying at the top 'half-Arab Muslim Briton' and two paragraphs down, again 'half-Arab Briton' then Heidi Schøne explaining why she did not entertain marriage with me: 'I did not want to become a Muslim' [but I never asked Heidi Schøne to become one] followed by: 'The terrorising continued right up to 1992. The man was then committed to a psychiatric hospital in the U.K. A Norwegian police official who investigated the case later explained that it was his mother who had him committed. When he came out again two years later it carried on worse than ever.' Police Sergeant Torill Sorte was the source for the 'two years in a mental hospital' allegation according to Morten Øverbye who interviewed her for Dagbladet. Immediately, the vilest of emails arrived in my in-box,

declared a religious hate-crime by Essex Police and sent to Interpol. The next day Dagbladet with their front page 21.12.05 story printed a banner headline: 'Pursued by SEX-MAD MAN for 23 years'. Then: 'Sexually harassed for 23 years' and 'half-Arab Briton' and 'I had a small child he thought should die. In other countries he would have been punished severely for that kind of threat,' says Schøne. The word 'Muslim' was mentioned once. Then came: 'The terrorising continued right up to 1992. His mother then arranged for him to be committed to a psychiatric hospital in the United Kingdom. When he came out again two years later it carried on worse than ever'. This was a complete fabrication as my family doctor twice testified to – never an-patient, he wrote. It was Police Sergeant Torill Sorte who supplied this false information to Dagbladet journalist Morten Øverbye as he himself told me and he called her a 'No-brainer liar' when I told him in a recorded conversation in May 2007 that I had never in fact been an in-patient. I then called Torill Sorte a "liar and a cheat" on social media for telling the nation that I had been sectioned for two years. She then goes to Eiker Bladet newspaper on 11 January 2006 where the story is 'Continuing the harassment of policewoman' by Roy Hansen. They print my name and say: 'Since then [2003] the Muslim man has also made the police investigator the object of his hatred.' Later, Sorte says: "I deal with it [the 'harassment'] and know that I did not do anything wrong in the matter. ....The man is obviously mentally unstable ..." (All this information was on SRA Caselines and was repeated orally at the SDT Hearing). So in 2006 I complained to the Norwegian Police Complaints Bureau but they refused to give Torill Sorte a copy of my complaint. A cover-up. The complaints officer, one Johan Martin Welhaven, without any substantiation, declared that Sorte's words "were neither negligent nor defamatory due to Mr El Diwany's website and other facts". I asked him exactly what on my website and which "other facts" indicated I was "clearly mentally unstable". Johan Martin Welhaven refused to say in his written dismissal of my appeal. Does one not need medical evidence to declare someone mentally ill? Welhaven was obliged to substantiate his declaration of certifying me mentally ill by adequate reasons for his diagnosis by saying exactly what it was on my website that supported his view and what these "other facts" were. As he did not his 'evidence' and decision is inadmissable. In plain English it is not worth the paper it is written on. Welhaven became a Police Chief two years later and a colleague of Torill Sorte. I kid you not! This obvious bias again would make his decision inadmissible. In 2010 Roy Hansen the author of the 11.01.06 Eiker Bladet article decided to give his story another airing online. He deliberately linked his article to the Google translate facility using webmaster tools so that when someone did a Google search on my name up comes a translation of his 2006 article – an imperfect translation but still saying 'Farid El Diwany ....is clearly mentally unstable.' I was a Lincoln's Inn Solicitor with very high profile clients: two Arab governments as well as private clients. Any of them Googling my name (or prospective new clients) would be put off using my services after reading that a Police Sergeant is calling me "clearly mentally unstable". So I wrote a letter of claim to Roy Hansen who ignored it. I sued him, Torill Sorte and her Ministry. I got judgment. Sorte and the Ministry applied to set it aside and succeeded mainly due to State Immunity and the requirements of the Mardas case: one needs proof that a good few people have read the libel. I provided Mrs Justice Sharp with my family doctor's letter stating I had never been an in-patient. I declared too that I was the Port of London Authority's Commercial Property Solicitor from 1989-1998 with no two year gap for incarceration in a mental hospital. I told Mrs Justice Sharp that even Sorte's interviewing journalist Morten Øverbye had later called her a "No-brainer liar". Ipso facto Police Sergeant Torill Sorte WAS an abject liar. A bent copper. Additionally I read out to Mrs Justice Sharp the hate-emails received after Torill Sorte told the nation I was sectioned in a mental hospital by my mother for two years and Heidi Schøne was quoted in the same article

saying I wanted her “young child to die”; emails such as: “Sick devil. Go fuck Allah Camel" and “I was once a Muslim but when I realised that the [Prophet] Muhamad was a confused paedophile I knew that God would never speak to such a loony...” and “I seriously doubt your semen would be taken by anything other than a pig. When you eat pigs do you lick the pig's arsehole clean before digging in?” and several others with similar sentiments. The senders of those emails clearly believed Sorte and Schøne. I read the half-dozen or so hate-emails out to Mrs Justice Sharp in the obvious expectation of getting a sympathetic reaction from her in Court at this severe harassment, the catalyst for which was the Dagbladet comments of Police Sergeant Torill Sorte and Heidi Schøne. But Mrs Justice Sharp said nothing in Court or in her Judgment of 29 July 2011. Indeed, in her Judgment Mrs Justice Sharp ruled that my claim was an “abuse of process”, that I was “harassing" Torill Sorte by bringing the claim, that I had received two convictions in Norway for “harassment" of Heidi Schøne thanks to my campaigns and that I was “not bringing the claim in order to defend my reputation”; as the matter of my being ruled as “clearly mentally unstable" had already been decided in Norway by Police Complaints handler Johan Martin Welhaven. Therefore my “re-litigating" in the U.K was res judicata. In other words it was confirmed in effect by Mrs Justice Sharp that I was indeed “clearly mental unstable". The point of Torill Sorte being a proven liar over her statement that my mother sectioned me for two years which resulted in me calling her “a liar” which in turn led her to claim that I was harassing her and must therefore be “clearly mentally unstable" was not addressed by Mrs Justice Sharp. Nor of course was Torill Sorte's obvious attempt to pervert the course of justice by her Witness Statment. May I take the liberty of calling a spade a spade? Thank you. Mrs Justice Sharp is a bigot and Islamophobe and a cheat and guilty of judicial misconduct. In three subsequent Applications to the Court of Appeal up to 2017 regarding the aforementioned aspects, once again my points were not addressed by the Court and my applications were dismissed as “an abuse of process" with no reasons given. All this was set out in my SRA Caselines evidence and discussed at the Hearing. Yet in the SDT Judgment there was not one word of censure for Heidi Schøne, Torill Sorte or Mrs Justice Sharp. Perverse. The SDT are supposed to be in the business of administering justice without fear or favour. They are obliged to call a spade a spade. So with clear evidence of Torill Sorte being an abject liar the SDT stay silent. The SDT fail to condemn Heidi Schøne's sick and fabricated uncorroborated allegations over 11 years - the main one being that I wanted to kill her two year old son – and the SDT chastise me for my campaigns, angry letters and a protest website. Then strike me off the Solicitors Roll. The SDT it seems had jettisoned it's critical faculties. It has mysteriously evaded its judicial responsibility to apportion blame when the facts allowing this are staring them in the face. Renvoi Rule 45 allows a judicial decision maker to ignore an overseas conviction if it was prosecuted and obtained in breach of “natural justice” or ECHR Rules. The SDT failed to consider this aspect in reaching their decision.

12. The SDT were unable to see the clear evidence that I had received unfair trials regarding my two prosecutions and convictions in Norway. It was all on SRA Caselines in my numerous emails and Respondent's Answer and amply discussed at the Hearing. I had told the SRA and SDT that my first trial in Norway was impossible for me to attend. I only received 19 days notice of the Prosecution hearing for the 30 October 2001 Magistrates' Court case: a Summons was served on me by the Brentwood Police via Interpol on 11 October 2001 and all it said was that I was “charged with violation of Section 390(a) of the Penal Code” and was “to appear and give testimony during the main hearing at Hokksund Magistrate's Court on 30 October 2001”. This short notice is a direct violation of Article 6 (3) (b) of the ECHR and a right to be able to properly prepare for a trial; otherwise it is an unfair trial. No Witness Statements were disclosed by Heidi Schøne which opened me up to ambush evidence at the hearing. Such

as rape. Police Sergeant Torill Sorte who gave evidence against me was supposed to be investigating Heidi Schøne's criminal conduct at the same time: she had a clear conflict of interest. Unbeknown to me she had already perjured herself by making a 1997 Witness Statement saying that my mother had sectioned me “on one occasion" in a mental hospital. A fabrication. On Thursday 11 October 2001 I was finishing a two week locum stint at Roger Green Solicitors in Billericay, Essex. I had then arranged to take time off for a fortnight to attend to the huge task of preparing for my own simultaneous criminal and civil prosecutions of Heidi Schøne and the newspapers in Norway beginning on Tuesday 15 January 2002. I had booked CPD courses for the 11th 15th and 19th November and 5th and 12th December without which I could not renew my Practising Certificate. I had some important social functions to attend as well. For the next four weeks after that I had to prepare for my own Norwegian prosecutions. I was told by my Norwegian lawyer Stig Lunde that I had good cause to initiate the Civil and Criminal cases against Heidi Schøne and her national and provincial newspapers. In 2011 barrister David Hirst of 5RB argued strenuously on behalf of Torill Sorte at the High Court that my decision to bring proceedings in Norway was “a symptom of my serious mental illness”. He provided no medical evidence to substantiate this assertion. The underlying motive for the Norwegian Police to charge me when they did was to sabotage my own forthcoming prosecutions of Heidi Schøne. A conviction against me for “harassment" of Heidi Schøne would scupper both my Criminal and Civil cases against her. But at the time of service of the Summons against me on 11 October 2001 I had absolutely no information from the Norwegian Police as to what the charges related to. Nothing further was given to me either. I suspected that it had something to do with my information campaign informing the Norwegian public of my side of the story. But my wording in my campaigns would not have been a criminal offence in England. A civil one maybe – but only if my information was false (which it was not). On receiving the Summons on 11 October I phoned my lawyer Stig Lunde and told him that I must receive outstanding replies from the Norwegian Police in Drammen in relation to my two letters to them dated 25th August 2000 concerning an evidential matter. I told my lawyer Stig Lunde that it was all very well receiving a Summons but I had to be told of the extent of the ‘evidence' against me. I never got anything. Lunde told me it related to my information campaign against Heidi Schøne and that it was a “strict liability" offence: there was no defence available under Section 390(a) of the Penal Code. I faxed Police Sergeant Torill Sorte on 17th October 2001 to say that Stig Lunde had appointed a criminal lawyer called Harald Wibye to defend me at the 30th October hearing but that there was not enough time for me to receive the evidence and consider my position, then instruct Harald Wibye who needed sufficient time to digest the material and consult with me. I managed to get a set of papers together from what I had on file and sent them off by registered data post to Harald Wibye in Norway. But they had still not reached him by 29 October. So I faxed him the more important papers from my files. The datapost package only reached his office after he had departed for the Hearing on 30th October. This sort of thing would not happen in England. Sufficient notice would be given to enable adequate preparation time for a Magistrates Court hearing. The SRA/SDT have disputed my assertion that the charge against me was one of strict liability: as per paragraphs 11.22 and 11.23 of the SDT Judgment when they say that the Norwegian Magistrates Court ruled that I “acted wilfully. Both the actus reus and mens rea elements of the offences of a crime were deemed present". I admit that I sent a few letters (not 200 or anywhere near that) TO Heidi Schøne and was responsible for a very large information campaign to the general public in Norway BUT it was a direct response to the Norwegian Press allegations. I was denying that I had threatened to kill Heidi Schøne's two-year old son, her neighbours and Heidi Schøne herself as well as making 13 years of obscene

phone calls to her and writing 400 obscene letters to her and much more - as described above. I wrote all this out in English and Norwegian and sent off sheets by fax and post to the general public and news outlets. My information sheets were not just detailing Heidi Schøne's sexual past and life history but also exactly what my detailed line of the full facts were. It was about 180 of these sheets that I had sent to third parties that the Magistrates Court had before them in the batch of '200 letters'. Hence their comment - to be seen on page A58 on the Caselines SRA Bundle that the basis of the indictment was that I wrote "... from England over 200 letters and cards to Heidi Schøne (formerly Heidi Overaa) and/or to various private individuals and to public and private firms and institutions in which he said/wrote inter alia ...". It is the aforementioned 'and/or' wording that is significant: they acknowledge that I did not write 200 letters TO Heidi Schøne. The SDT say in paragraph 11.4 of their Judgment that I had sent "... over 200 cards and letters to her [Heidi Schøne] in Norway and to various individuals and public and private bodies in Norway". This is misleading as it gives the impression that I just may have sent the vast majority of the 200 letters etc. directly TO Heidi Schøne. There is no point sending my Information Sheets to Heidi Schøne. It was these Information Sheets sent to third parties that were being returned to the Police by the recipients at the request of the Police. The quoted 200 'letters and cards' consisted mostly of my Information Sheets sent to the general public plus a FEW letters TO Heidi Schøne. The letters I wrote TO Heidi Schøne were exhibited in Mrs Justice Sharp's Judgment of 29 July 2011. As shown in the SRA Caselines Bundle on pages A38, A39, A40 and A43. Six letters all written in 1995 after I had just learnt from my lawyer Helge Wesenberg's letter dated 28 February 1995 that Heidi Schøne had reported me to the Norwegian Police in 1986 for "attempted rape". A complete fabrication. Hence my angry letters to Heidi Schøne after I had earlier called her up to ask her to apologise for attempting to pervert the course of justice. I tried a few more times to get an apology from Heidi Schøne on the phone without success. The Norwegians and SRA/SDT labelled these desperate calls of mine to Heidi Schøne as "harassment". My angry letters followed, the more so after Heidi Schøne taunted me on the phone asking me if I wanted to have lots of sex with her as she was "still attractive" and other sexualised comments. Hence my strong rebukes in my letters to her regarding her sexual past. She'd had 21 different sexual partners by the time she was 21 with many one-night stands. She frequently talked about sex whilst she was in England. She told me she'd had two abortions whilst at school. That when she was 15 she "discovered boys". Her psychiatrist Dr Petter Broch is on the Drammen Court record in 2001 and 2003 as saying Heidi Schøne had "a tendency to sexualise her behaviour" and had "a pathological relationship with her parents" and on Heidi Schøne's word alone "had suffered sexual abuse at the hands of her stepmother's father and mental abuse from her two sisters". ALL this information was in my book free to download on my website but neither the SRA nor the SDT would read it. I could hardly attach a 700 page-plus book to the SRA Caselines. I was taught at Primary School that books were for reading. R-e-a-d-i-n-g. An important tool for information input. For accurate assessments to be made on events everything depends on one's 'state of knowledge'. The SRA's and SDT's state of knowledge was deficient because they refused to read my website or my free to download book. Many of my angry letters to Heidi Schøne were written AFTER the May 1995 newspapers came out calling me a potential killer. That major fact was NOT revealed by the Norwegian Magistrates Court charges. Deceitful. The Norwegian authorities knew perfectly well why I got so vociferous in my condemnation of Heidi Schøne regarding the 1995-1998 charges: 1. I was not an "attempted rapist" which was a serious attempt on Heidi Schøne's part to get me a prison sentence and 2. I did not threaten to kill her or her son or her neighbours (and much more besides) as she told the Press. Indeed, her wickedness was compounded by her changing her allegation a whole 12

years later in 1998 to actual rape – which she communicated to the Magistrate on 30 October 2001. The Press then printed that rape allegation in Drammens Tidende as if it was a fact. There was no way I was going to go back to Norway to appeal my conviction if I was then going to be held for questioning over a rape accusation if at the Appeal Heidi Schøne histrionically used her wiles to insist I had raped her by 'holding her down' as Police Sergeant Torill Sorte had suggested to me over the phone in 1998. Further, my lawyer Harald Wibye told me that if I did appeal I would "definitely" get a 6-12 month prison sentence. The ECHR recognises that hopeless cases do not have to be pursued. So the SRA were wrong to argue that I should have appealed. I must say that there was no equality of arms with regard to the disclosure of evidence for the "attempted rape" / actual rape" allegations arising out of the same incident. In the case of Rowe and Davis v. the United Kingdom No. 28901/95 of 16-2-00; (2000) 30 EGRR1, the Court declared that a failure of the prosecution to disclose documents to the defence may impair the fairness of the proceedings. In her verdict of 16 November 2001 the judge indicated she seemed to believe Heidi Schøne's allegation of actual rape, by referring to it in her verdict. Before the criminal hearing of 30 October 2001 my lawyer Harald Wibye should have been given an opportunity to see both Heidi Schøne's 1986 Police Witness Statement alleging 'attempted' rape and her changed 1998 Police Witness Statement alleging actual rape but the Police Prosecutor disclosed neither. Harald Wibye was unable therefore to see the detail of the statements and cross-examine Heidi Schøne on the conflicting statements in order to examine her credibility as a reliable witness. My lawyer Harald Wibye argued before the Magistrate that my letter writing/Information sheet campaigns were provoked by the discovery of the allegation of attempted rape (now rape) and Heidi Schøne's fabricated 1995 and 1998 newspaper allegations when the Press labelled me the "insane Muslim". And that therefore I should have been charged under Section 390 of the Penal Code which allowed a defence of 'justified comment' – for provocations that merited a right of reply under Article 10 of the ECHR, to be communicated to a cross-section of the Norwegian public just as I did. And in return for the newspapers telling tens of thousands of people in Norway that I was a sex-terrorist Muslim abuser making death threats to various people. What the SRA, SDT, Mrs Justice Sharp and the Norwegian Public Prosecutor did not reveal was my obvious justification and reason for my actions. Heidi Schøne had forfeited her right to privacy for her own private life. By going to the Press she had opened herself up to public scrutiny in return. The Norwegian Press were under a public duty by their 'Pressens Faglige Utvalg' (PFU) regulations to contact me first before going to print to ask my opinion about Heidi Schøne's allegations of '13 years of sex-terror'. None of the three newspapers did this. They could easily have got in touch with me. After going to print the newspapers were obliged by their PFU Code of Ethics to print my response. They did not. So my information campaign continued with the addition of a website in 2000. No more letters were written to Heidi Schøne after 1998. Just my usual 'Information Sheets' were dispatched. Those, along with my website, got me a second conviction in 2003 for 'harassment'. I did NOT have the mens rea or actus reus to commit "criminal" offences. My actions were NOT in fact criminal in nature in my mind as I had an ECHR Article 10 right of reply and right to communicate my distress to my abuser Heidi Schøne. But the deceitful Norwegians did not recognise this right as expressed/provided for in Section 390 of the Penal Code in giving a defence of "justified comment" to communications. British and ECHR jurisprudence does recognise this right. Section 390(a) was a strict liability charge in the sense that the mere fact of writing in the terms that I did was automatically punishable with a conviction; then again if my information campaigns and website offended shocked or disturbed the Norwegian state or a sector of its population or Heidi Schøne I submit that it does not matter as such information as mine is permitted by the

ECHR in the interests of “pluralism, tolerance and broad mindedness" – see paragraph 49 of Handyside v. United Kingdom. My information in any case was as nothing compared to the vitriol written in the Norwegian newspapers. Besides which the Drammen Civil Court with Judge Anders Stilloff presiding, held that my information was “more or less correct". No defence of any sort was possible under Section 390(a) and that section mirrored the U.K civil tort liability where in some cases there is strict liability for certain torts (Rylands v Fletcher case). That is why my lawyer Harald Wibye told me any appeal under Section 390(a) was a complete waste of time as the defence of justified comment was not going to be available. So I was persuaded not to appeal. Likewise for my 2003 conviction which was also given on a Section 390(a) charge. The SRA and SDT failed to take these matters on board and neither did Mrs Justice Sharp. The evidence was all on Caselines for the SRA and SDT to consider and in not doing so they did not test the evidence properly. The SDT said in their Judgment at paragraph 11.23 that they rejected my view that my actions would not be offences in the U.K. The SDT thought my actions were covered “potentially" by the Protection from Harassment Act 1997 and/or Malicious Communications Act 1998. But they provided no evidence from the British Police or the CPS that my actions if repeated here would be liable to criminal prosecution. The main point of this aspect is that I would not have started any campaigns in the U.K as the British Press would have rung me up first before doing a story and heard me out. If I had not been harassed with Heidi Schøne's totally false allegations of attempted rape - then rape - and threats to kill a child and to kill several others and making 13 years of obscene phone calls and writing 400 obscene letters and sex-terror and Lord knows what else, then I would not have retaliated by giving my side of the story to the public. Remember, what the Norwegians are relying on for the 13 years of harassment and sex-terror from 1982 to 1995 is solely Heidi Schøne’s uncorroborated word. No evidence for this was ever provided. If I had written a letter in 1986 threatening to kill Heidi Schøne's two year old son because he was “a bastard and bastards don’t deserve to live" as she’d alleged in Court, then any sensible person would keep the letter and make copies and hand a copy in to the Police. No such letter was found as it was not written in the first place. When I found out about this sick allegation from Police Sergeant Torill Sorte I wrote the letter of November 1997 to Heidi Schøne which is mentioned in paragraph 11.5 of the SDT Judgment. The SDT were just doing a cut and paste job from Mrs Justice Sharp's ill-advised Judgment of 29.07.11 by reproducing this letter. No explanation is given as to why I wrote it: it was not unsolicited. But Mrs Justice Sharp gives the clear impression that it was unsolicited. To learn I wanted to murder a two year old child (who by the way I adored) and who was telling everyone what a great friend he had in England in August 1990 after I spent the day with him, was infuriating and shocking. That is why I reminded Heidi Schøne in my November letter to her that she had killed two of her own unborn children by terminations. (And please, no lectures on a woman's ‘right to choose’). Why would I want to kill a two year old boy, eh?? Only a psychopath would want to do that. Was that one of the reasons Police Complaints official Johan Martin Welhaven ruled I was “clearly mentally unstable"? Did he believe Heidi Schøne? Did David Hirst of 5RB believe her? Do the SDT? Besides which, to write a letter threatening to kill a child would be professional suicide. I was shortly to qualify as a Solicitor. Despite trying for the next eight years to bring Heidi Schøne to justice for this extremely sick allegation it was repeated as “a death threat" on the front page of Dagbladet national newspaper on 20/21 December 2005. Hence the hate emails that immediately followed. The emails were a hate-crime ruled the Essex Police in 2006. But excused by Mrs Justice Sharp in 2011 – condoned with no comment when read out to her. And people wonder why I call Sharp J. a bigot and Islamophobe. Mrs Justice Sharp's ‘findings of fact’ should be overturned. Sharp J. says I “harassed” Police Sergeant Torill Sorte

by accusing her of lying and subsequently suing her at the High Court over her allegation that my mother sectioned me in a mental hospital for two years and therefore Sorte concludes I was “clearly mentally unstable". It is hard to discover precisely the evidential basis for Mrs Justice Sharp's ‘findings of fact’. As I had not in fact been sectioned at all or been an in-patient then Torill Sorte was a liar and I was not harassing her by remonstrating with her and suing her. Sharp J. plainly did not test the evidence properly and nor did the SDT. There was no equality of arms in the Norway litigation. For the 30 October 2001 hearing I was not there to give my instructions to my lawyer to enable a more thorough cross-examination of Heidi Schøne's fabricated allegations. Especially the one on rape – her favourite tool of revenge. I was the third man she had accused of raping her. At our civil proceedings in Norway in 2003 I was prevented from cross-examining Heidi Schøne as she was too mentally ill according to her psychiatrist. The whole point of the proceedings was to test her evidence by a cross-examination. Four hours was agreed by her lawyer before I left England. When I got there it was sprung on me that she was too ill to take the stand. I was sunk. The trial was cut short by one and a half days as the judge had “urgent legal business to attend to”. My appeal was dismissed. At the end of the case I was arrested at the door of the Courtroom and driven straight in the cells at Drammen Police Station. Officials from the British Embassy visited me. They were amazed at what had happened. They told me it was my website that the Police were most unhappy about. These officials Neil Hulbert and Patricia Svendsen told me I had a right to voice my opinion on a website. I told them my story. After speaking to the Police they came back to tell me that the Police wanted to imprison me for the website. I was told that evening that I would be taken to the Magistrates Court first thing in the morning. Overnight Harald Wibye was in contact with the Police. In the morning the Police Prosecutor, Ingunn Hodne, told me that either I “freely confess" to harassment of Heidi Schøne and acknowledge my wrongdoing and promise to take my website down - in which case I MAY be allowed to go home or I will definitely be going to prison. Harald Wibye was given a hard time by the Police who were not convinced that on my return to England I would take the website down. So Harald Wibye made me promise him that I would take it down on my to return to England. He told me that the Police offer of then letting me go was subject to the discretion of the Magistrate. I therefore decided that the only way to go home now was to “freely confess” my guilt and agree to take my website down. I did this under obvious duress. Then I was let go after I paid the fine. A real lynching was this affair. There was nothing illegal about my website under U.K law. The SDT did not even look at it even when repeatedly asked to tell me what on there broke the criminal law of England and Wales. The SDT clearly have not tested the evidence properly. The convictions in Norway were not fairly decided and the SDT were wrong in how it assessed the evidence. The sheer scale of the Islamophobic hate attack on me by the Press from 1995 to 1998 was not recognised by either of the Magistrates in 2001 and 2003. Nor my right to condemn the Press and Heidi Schøne on my website. The state-endorsed Press hate campaign continued until 2011. That the Norwegian Police have refused to co-operate for the last 14 years with Interpol and the Essex Police over the 2005 hate crime initiated by Police Sergeant Torill Sorte and Heidi Schøne speaks volumes in exposing Norwegian State bigotry and the lack of respect for the rule of law. The ‘findings of fact' by Sharp J. are not correct at all. Which means neither are the SDT's. They have both misdirected themselves in how they have applied the law. My so-called ‘harassment’ was a misnomer: my actions were not unlawful under English law as it recognises a right of reply and criticism to egregious allegations as set out above.

13. Just because people like Heidi Schøne and Torill Sorte feign distress at being exposed as liars and cheats does not mean I have broken any ECHR Articles. My punishment in Norway was

out of all proportion to my action of freedom of expression after the public allegations made about me: from attempted rape; to rape; to being a potental child-killer. None of this Press rubbish would have arisen in England for reasons previously stated. My Article 10 ECHR rights were violated as were my Article 6 ECHR rights to receive fair trials in Norway.

14. The Norwegian authorities incorrectly applied the Criminal Code in that they should have charged me, if at all, under Section 390 of the Penal Code, (as opposed to Section 390(a) of the Penal Code), which gave me a defence of justified public comment. This is what my lawyer Harald Wibye argued for and the clueless magistrate went back to her chambers to consult her statutes, but according to Mr Wibye she came back none the wiser and without giving reasons decided to carry on under Section 390(a).
15. What "pressing social need" did the Norwegian authorities have in mind in wanting to prohibit me putting my side of the story cia my Information campaigns and a website? See the case of the Sunday Times v. The United Kingdom (1979) 2 EHRR 245. The Norwegian authorities gave themselves far too wide a margin of appreciation in prosecuting me: they wanted unlimited power of appreciation which they were not entitled to. In other words the Norwegian Public Prosecutor was unreasonably limiting my own ECHR Article 10 rights.
16. The measures taken against me were not "necessary in a democratic society for the protection of health or morals". How did my public protest website and public protest Information campaign offend against morality? On the contrary, my communications condemned and highlighted immorality. Besides which, the worst of the Dagbladet and Verdens Gang newspaper articles are STILL online – they refuse to take them down. So why should I take my website down? No British laws or ECHR Articles are broken. The Norwegian Police should have left it to Heidi Schøne to decide if she wanted to sue me for libel. Even then I only printed the truth.
17. The SDT should have taken on board my Article 6 arguments for unfair trial procedures in Norway and my related comments on the British Government Foreign Minister Dominic Raab's intervention on behalf of Ms Freya Heath who was convicted in Cyprus in January 2020 of public mischief by her false gang rape allegations against 12 Israeli men. So in principle the British Government does recognise unfairness of trials abroad when it sees fit. Lord Pickles recognised the abuse I had received from Norway and asked Lord Chancellor Chris Grayling in 2013/14 to remedy the mischief Mrs Justice Sharp in turn had caused. The Essex Police and Met Police also support my case that the Norwegian Press are Islamophobic. The SDT ignored this evidence. There is a conflict of laws between Norway and Britain which should have been correctly applied to my case with the SRA.
18. The SRA made a 'without prejudice' offer to suspend me for four years in return for admitting the charges. I rejected this offer. Now the SDT have struck me off. A disproportionate punishment by far. Especially when the Essex Police are presently battling with the Norwegian Police over the 2005 hate crime incident the catalyst for which were my abusers Heidi Schøne and Police Sergeant Torill Sorte. My convictions were an endorsement and support of Norwegian racist and Islamophobic abuse. A direct violation of my Article 14 ECHR rights regarding the Prohibition of Discrimination. As per Sander v United Kingdom (2001) 31 EHRR 14, the Norwegian judges at criminal and civil jurisdictions should have reacted in an appropriate manner to dispel the perverted way in which the Norwegian Press and Heidi Schøne described my Muslim credentials. Islam is very important to me and I took particular offence at my Muslimness being directly associated with extreme perversion. The inference could be drawn that I was a typical 'Muslim hypocrite'. This breach of ethics by the Norwegian Press, Police (and later their judiciary) was the reason for my May 1995 and onwards information campaigns. Why therefore should I have to disclose these perverse convictions to

the SRA? They would never be given in Britain. The SDT, in striking me off, are giving the green light to my deceitful racist abusers.

19. My initial campaign against Heidi Schøne from April to May 1995 in response to discovering a wholly fabricated “attempted” rape allegation resulted in my writing many letters to her rebuking her in the strongest terms for such a blatant attempt to ruin my life. Just because I told her father she was sleeping with a heroin abuser and telling him to intervene. This attempt to pervert the course of justice by Heidi Schøne and ruin me was not the action of a “vulnerable" woman as the SDT were so keen to emphasise in their Judgment. It was cold, calculated criminality. As was her changed allegation a whole 12 years later, when the pressure was on, that I had actually raped her. The fact is that my private letters to her at this time - and telling her few neighbours about her past, did not result in a prosecution for harassment. It was AFTER the newspaper stories came out in late May 1995 that my campaigns started in earnest. And it was another six years before any charges were laid. Heidi Schøne showed further malicious criminal intent by her communication to the Police and Press that I had written to her telling her I would come to Norway to kill her son. Or on another occasion to kidnap him. As were her Press allegations that I had written 400 obscene letters to her, made 13 years of obscene phone calls (so why not record just one of them?), that my mother tried to section me, that the harassment all started the moment she returned to Norway in 1982 (her passionate love letters for several years after that on the SRA Caselines disprove that), that I wanted to kill her neighbours and her and her son. In Court she said I was a Shia Muslim: evil Iran was making the news in Norway at the time. She knew I was Sunni. She said I regularly phoned her up to ask her what colour underwear she was wearing, sent her funeral cards, raped her (but refused to disclose her “attempted rape" Witness Statement or later “rape" Witness Statement - as it would “prejudice her case” said her lawyer). Sorry SRA and SDT: these were NOT the actions of a vulnerable victim with mental health difficulties whose privacy deserved to be preserved at all costs. See the SDT's facile defence of Heidi Schøne in paragraph 23 of their Judgment: “The fact that Ms H was vulnerable, as the Respondent was aware, added to the seriousness". Her actions were the actions of a criminal delinquent. The public had every right to know every intimate detail of her past life as she had willingly put herself in the public eye by going to the Press and lying all the way about every detail of my private and personal life. So the SDT can take a running jump for their totally inappropriate characterisation of my continued campaign as “a further aggravating factor" (14th line in paragraph 23). If the Daily Mail and the Sun newspapers are allowed to print every intimate detail of a subject's private and personal life once the said subject has started lying like a b*stard (to another newspaper or in Court) then so can I relay my accuser's private life. ECHR Article 10 does apply. My campaigns were completely legal under current British Press Standards and Codes of Conduct. So b*llocks to the SDT.
20. The SDT cannot seem to grasp one simple fact: it was Heidi Schøne herself who spoke to the Press from 1995 to 2011. It was her information the Press relied on and then printed. So for the SDT to say in paragraph 22 that this information “...had not on the evidence emanated from Ms H but from press articles...” shows a lack of due diligence on the part of the three members of the SDT Panel. The facts were wholly apparent from the Caselines Hearing bundle and my book and website. Why do the SDT think that by my acting in accordance with British Press ethics I “caused harm to the reputation of the profession" and my actions “amounted to a significant failure to act with integrity"? The SDT lack integrity by this gross lack of judgment. They also lack integrity for not condemning Police Sergeant Torill Sorte for her dirty tricks campaign when telling the whole country that my mother sectioned me for two years in 1992. The SRA know this is a complete fabrication too: they have been granting me

Practising Certificates without a break from 1987 until I retired in 2017. I was never incarcerated at all. The SDT cannot even bear to look at my website to tell me what it is on there that breaks England's criminal laws. There is nothing on there that contravenes the criminal laws of this country. Get the Daily Mail and the Police to look at norwayuncovered.com and tell me what exactly on it breaks the law. Not a thing! The SDT lack integrity for not condemning Heidi Schøne for her own dirty tricks campaign covering the period 1995 to 2011 in her saying that: I wanted to kill her and her neighbours and her infant child, that I did obscene things in front of her, and that I was abusive in her prescence, a misogynist, a rapist, an aggressive sex-pest, coercing her to become a Muslim. This is certainly designed to denigrate me as just another 'Muslim hypocrite': in 'coercing' her to become a Muslim my actual behaviour was anything but Islamic. From 1982 to May 1995 there were no allegations from her to the Police or anyone else that I had made years of harassing obscene phone calls to her or had written a letter threatening to kill her child in 1988 or written years of obscene letters to her. She had no phone from 1988-1993. Then, all of a sudden in May 1995 it was '13 years of sex-terror'! In 1997 it was revealed for the first time ever that I had written a letter to her threatening to kill her son. None of her highly charged allegations were contemporaneous. All were on her own uncorroborated word. In my civil libel proceedings against her in Norway the rules of admissibility of evidence and the weight attached to them are not the same as under the Civil Evidence Act 1995. In Norway a witness's word is completely sufficient to prove the truth of the allegation: corroboration is not required. There is no requirement to disclose evidence to the other side if it is not "in the client's best interests". So it SEEMS I was a rapist, a potential child-killer, a purveyor of 13 years of harassment and sex-terror and hundreds of obscene letters and endless years of obscene phone calls and 13 years of death threats. I was not even allowed to test the evidence of Heidi Schøne by cross-examination of her. She was allowed to give her evidence but I was prevented from cross-examining her. The reason it seems was that when the time arrived for the 4 hours for cross-examination agreed previously by her lawyer she was, very conveniently, now too mentally ill: she was on a 100% disability pension for mental illness due to "an enduring personality disorder initiated in her adolescence" according to her psychiatrist Dr Petter Broch. Heidi Schøne told him that I regarded her as my "property" and that she had to "hide under the bed" when I visited her unannounced in Norway. That she had "secret addresses". All utter rubbish. Heidi Schøne would not be a 'competant' witness or a 'credible' witness under English law. She had plenty of motive to conceal or misrepresent matters. Her evidence would not be admissible either as 'evidence of the facts' due to the absence of being able to test her evidence. The procedural defects in my criminal trials in Norway also mean that the verdicts are unsafe and cannot be relied on and under Renvoi Rules 44 and 45 can be ignored by the English judiciary. These defects were completely ignored by Mrs Justice Sharp in her 29.07.11 Judgment. Her 'findings of fact' should be overturned. The SDT had never met Heidi Schøne, yet they talk as if they knew all about her. They feel sorry for a 'vulnerable' woman who has been 'harassed' by a Solicitor; yet not a word of condemnation for her as someone who has told the whole country that "the Muslim man" wanted to kill her two year old son. A sick lie which the SDT, it seems, think just might be true. Only a signed confession from Heidi Schøne would convince the SDT she was a fantasist abuser. She was in some ways like our own Carl Beech: "credible and true" said an easily duped Met Police regarding the fantasist's wild sex-abuse allegations against major figures in the British establishment. Beech was treated as a 'vulnerable' victim. Not any more.

21. For the SDT to say in paragraph 29 of their Judgment that I showed "a complete lack of insight" into my actions and must therefore be struck off for the sake of the "reputation of the

profession" and a “concerned public" shows just how out of touch they are with current ECHR rules regarding freedom of expression. I consider my website to be the most significant exposé of Norwegian bigotry ever published. The same for my book. My website has its’ admirers in Norway as the SDT are only too aware. A book and a website which detail and discuss the far-right discourse in the Norwegian Press about me as a ‘vile Muslim abuser' (and other examples of racism) that mass-murderer Anders Breivik would have been reading for over a decade and which surely further encouraged him to hate Muslims to the extent of carrying out mass-murder. My book is on Waterstones website and several others. One Solicitor told me he couldn't put it down - it was that interesting. All that is on my website is in my book. Heidi Schøne and Anders Breivik share the same ideology along with the mainstream Norwegian press. Ironic that Anders Breivik's car bomb blew up the offices of my sworn enemy Verdens Gang newspaper. Breivik was just the extreme manifestation of a popularly held view. As confirmed by Oslo University academic Sindre Bangstad's excellent book ‘Anders Breivik and the Rise of Islamophobia'. So go figure SDT.

22. I ask to be restored to the Solicitors Roll with no Order for costs.

Farid El Diwany

27 January 2020