

IN THE HIGH COURT OF JUSTICE

Queen's Bench Division / Administrative

Court, UK

AND

IN THE HIGH COURT

(An Ard-Chúirt)

Dublin Circuit, Ireland

IN THE MATTER OF THE CONSTITUTION OF IRELAND

AND IN THE MATTER OF THE EUROPEAN CONVENTION ON HUMAN RIGHTS ACT 2003

AND IN THE MATTER OF THE HUMAN RIGHTS ACT 1998 (ENGLAND & WALES)

AND IN THE MATTER OF AN APPLICATION BY PETER IVAN DUNNE

FOR DECLARATORY AND INJUNCTIVE RELIEF, DAMAGES IN TORT, AND FOR MALFEASANCE IN
PUBLIC OFFICE

AND FOR AN ORDER OF CERTIORARI QUASHING ALL JUDGMENTS

*(including extradition judgments, conviction judgments, Statement of Offences / magistrate
judgments, and family law judgments) as VOID AB INITIO*

CRITICAL URGENCY & HUMANITARIAN BASIS

THIS APPLICATION IS EXTREMELY TIME-SENSITIVE

The Applicant, together with dependent and affected parties, is in a state of **absolute destitution, homelessness, and critical food insecurity**, caused directly by the unlawful actions of the Respondents.

The Applicant is unable to pay for postage or printing and requests that **all service be deemed effected by email** in accordance with principles of **access to justice, proportionality, and fair procedure**.

BETWEEN

PETER IVAN DUNNE

Of no fixed abode, currently homeless and effectively stateless due to the State actions herein challenged

No postal address; communication only via **email** for this case:

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APPLICANT

(On his own behalf and on behalf of affected parties under the principle of McKenzie Friend and in the interests of justice as a lay representative)

-AND-

[UK Jurisdiction]

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County Court (Family Division), Coventry

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[IRELAND Jurisdiction]

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THE COURTS SERVICE OF IRELAND

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[UK & Ireland Government Bodies Relevant to Recognition of Palestine]

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1. Application for Extraordinary Relief

Seeking whole life compensation as a consequence of sustained systemic abuse of justice and law over 22 years, resulting in extreme harms and losses.

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2. PREAMBLE

This is a dual-jurisdiction originating motion and application for judicial relief, accountability, and protective orders, filed by Peter Ivan Dunne.

It arises not from any misunderstanding of jurisdictional limits, but from their deliberate and unlawful exploitation by members of the judiciary, prosecution, and policing services. This abuse of jurisdictional boundaries has been orchestrated to shield misconduct, suppress exculpatory evidence, and deny fair process. Both the United Kingdom and Ireland are therefore individually and jointly liable for every abuse occasioned, regardless of where it took place, because each state assumed jurisdictional responsibility and each facilitated or condoned the violations of the other.

This joint liability is not only a matter of logic but of law. Under the principle of speciality in extradition, once either state invokes or relies upon cross-border jurisdiction, both are bound to ensure that all rights guaranteed under the Human Rights Act 1998, the European Convention on Human Rights, and the Extradition Acts are fully respected. Any deviation by one state, when known to and uncorrected by the other, amounts to a joint breach. In such circumstances, there can be no lawful distinction between “abuses committed in Ireland” or “abuses committed in England.” Both states carry full responsibility for each violation, wherever it was occasioned.

I state plainly: this case could not have reached its present form without direct judicial complicity in perjury, suppression of evidence, and institutional abuse of process coordinated across international boundaries. This is no abstraction. The evidence demonstrates that at least two sitting or retired Irish judges materially participated in conduct amounting to perversion of the course of justice on UK soil — conduct later concealed through reciprocal institutional deference, while other judges and authorities in both states knowingly suppressed exculpatory material and ignored binding law.

This filing is deliberately extensive and citation-rich. It is presented not from lack of procedural competence, but to ensure that the full scale and gravity of these events can be assessed by the courts, by legal practitioners, by parliamentarians, by rights observers, and by investigative journalists tasked with examining the wider public consequences.

When judges knowingly allow perjured evidence to stand — or worse, enable it themselves, especially across jurisdictions — they abdicate their role as guardians of justice and become its

saboteurs. In such circumstances, the obligation to expose, correct, and protect lies not only with higher courts, but with the public interest. This motion fulfils that obligation.

3. Disclosure as legal right, moral duty and as an Immutable Record

3.A. Under Irish Law and Citizenship

As an Irish citizen, I act within the inherent jurisdiction of the Irish law to protect against clear and foreseeable harm. I assert a lawful moral and legal obligation under Irish constitutional and common law principles—particularly those laid out in:

Article 41.3 of the Irish Constitution, affirming the duty of the State to protect personal rights;

Article 29, affirming Ireland's obligations under international law and justice;

Re a Ward of Court (No. 2) [1996] 2 IR 79, confirming that where the State fails, citizens and the courts retain inherent authority to intervene.

This disclosure also complies with the Protected Disclosures Act 2014, which shields and affirms the rights of whistle-blowers acting to reveal wrongdoing in the public interest.

3.B. Under UK Law and Citizenship (Attributable)

I did not apply for British nationality. It was conferred upon me without consent, for what I believe was part of covert operations and deliberate concealment by UK-linked actors to further undermine my rights and ability to defend. By attributing UK citizenship to me, the UK government has invoked positive jurisdiction and has no legal standing to block publication. Rather, I now possess a duty under UK law to expose ongoing misconduct.

This duty is protected under:

The Public Interest Disclosure Act 1998 (UK), which grants civil immunity to individuals disclosing systemic wrongdoing;

Article 10 of the European Convention on Human Rights, as affirmed in:

Re S (A Child) [2004] UKHL 47 – balancing individual and public interest rights in favour of publication;

Lachaux v Independent Print Ltd [2019] UKSC 27 – affirming the right to rebut false claims and present the truth in public.

All files, statements, case records and evidence are being published as part of my autobiography, jointly prepared with and containing this very application, complete with relevant evidence, redacting only the names of innocent persons.

This principle is supported by established case law affirming the limits of judicial authority over extraterritorial acts:

[uk] In *Lucasfilm Ltd v Ainsworth* [2011] EWCA Civ 1309, the UK Court of Appeal held that courts lack jurisdiction to grant injunctions with extraterritorial effect, confirming that enforcement cannot extend beyond the sovereign territory. This supports the position that automated, out-of-jurisdiction disclosures cannot be restrained by UK courts.

[ie] In *DPP v Dunne* (KK24/03), Judge Olive Buttimer acknowledged the limited reach of Irish courts regarding overseas publication, further reinforcing that such disclosures fall outside the jurisdiction and suppression powers of Irish courts.

4. Critical Urgency of Hearing & Constitutional duty to protect, vindicate and restore.

The Applicant respectfully submits that this case requires immediate attention and cannot afford any further delay. The Applicant, his estranged wife, and their daughter have been homeless for the past year due to the ongoing consequences of this injustice. As a direct result of the actions of the prosecution and the Court, they have lost their income and have now exhausted all financial reserves. The Applicant and his family are in a state of extreme financial distress, and any further delay in these proceedings poses a grave risk to their well-being.

The urgency of this matter cannot be overstated, as the Applicant is now surviving on very limited assistance from a family member and remains at immediate risk of starvation. Such a situation invokes the protection under Articles 2 and 3 of the European Convention on Human Rights (ECHR), which safeguard the right to life and protection from inhuman or degrading treatment. In addition, it implicates the Irish Constitution, which enshrines the right to life and bodily integrity.

Furthermore, the Applicant has been denied adequate legal representation at any time since the beginning of this case in 2003 in England. Since 2007, the Applicant has been unrepresented and has been unable to secure representation, which constitutes a violation of his right to an adequate defence as guaranteed under Article 6 of the ECHR, as well as under Irish and English law. Article 6 ensures the right to a fair trial, including the right to legal assistance. The failure to provide the Applicant with proper legal counsel from the outset of these proceedings has deprived him of his right to a fair trial, and continues to violate his fundamental rights under Irish, English, and international law.

This failure is particularly evident in multiple instances. When the Applicant had to address the High Court on his own application for the destruction of DNA, the Irish counsel provided to him failed to follow explicit instructions. In another instance, when addressing Judge Olive Buttimer at the Circuit Court regarding a matter of publications, the Applicant had to instruct his own counsel to remain silent and, despite counsel's objections, successfully addressed the Court himself. The Applicant correctly pointed out that Judge Olive Buttimer had no jurisdiction to rule on overseas publications, or even to question the Applicant, as he was out of Ireland at the relevant time. This instance further underscores the inadequacy of the representation provided, as the Applicant was forced to take on the role of his own advocate, ensuring that the legal proceedings adhered to international law.

4.1. Legal Representation and Counsel Failures

1. Absolute Failure of Counsel

Despite having access to highly experienced legal counsel, the Applicant's rights were categorically unprotected. At every stage, legal representatives, whether privately retained or court-appointed, failed to grasp or address the scale of abuse inherent in this case. Even in the few instances where counsel did understand the scope of the failures, they were powerless to effect any meaningful redress. Their inability to act effectively has exacerbated the harm suffered.

2. Court Complicity

The courts themselves have not merely ignored these failures; their conduct demonstrates complicity. All legal representatives act as officers of the court. Therefore, the logical conclusion is that any counsel, irrespective of appointment or jurisdiction, is inherently

vulnerable to compromise. Consequently, the Applicant cannot rely on any legal representative or state authority to safeguard his rights.

3. Lack of Representation at Sentencing

At the sentencing hearing, the Applicant appeared without legal representation.

Subsequent counsel appointed by the Court of Appeal has failed to respond to repeated attempts to secure guidance or representation. This sustained neglect constitutes a continued denial of the Applicant's right to a fair trial under Irish, English, and international law.

4. Extradition Complexity and Rule of Speciality

This case involves extradition in violation of the rule of speciality. Effective representation would require counsel licensed to practice in both jurisdictions with comprehensive knowledge of the law. Given the systemic failures and the unprecedented scale of abuse, such representation is now practically impossible, and reliance on appointed counsel cannot remediate the harms already inflicted.

5. Imminent and Inevitable Harm

The situation is so severe that any further delay in legal intervention guarantees grievous harm to the Applicant and his family. The prolonged absence of effective representation has already resulted in the ongoing deprivation of basic human rights. The Applicant respectfully urges the Court to recognize the urgency of the matter and expedite proceedings.

6. Conclusion

While the provision of counsel is theoretically desirable, in practice, it cannot restore justice in this case. The Applicant remains in a precarious position with insufficient resources to mitigate the inevitable harms, and the systemic failures of both counsel and the courts render any further appointment of legal representation ineffectual.

5. Addressing the Court

The Applicant respectfully submits that the actions of the prosecution and the Court have been so egregious that the Applicant cannot, in good conscience, swear any oath or affirmation before this Court. The prosecution, having sworn oaths before the Court, proceeded to engage in violations so severe that the Applicant now perceives the oath itself as a precursor to deceit and harm. To issue an affirmation or an oath would place the Applicant in a position of compelled falsehood, as it

would be impossible for the Applicant to make such a declaration with any sincerity, given the clear absence of honor demonstrated by those involved.

As a direct result of these serious violations and the Court's role in permitting and committing them, the Applicant feels compelled to decline the swearing of any oath or affirmation. The Applicant cannot use terms such as "Honorable Court," "Justice," or "Your Honor," as doing so would, in the Applicant's mind, be a lie. Until such time as the Court restores its honor by restoring the Applicant, the Applicant cannot in good faith address the Court as such. The Applicant now wishes to address the Court respectfully, but in good conscience must refer to the Court in neutral terms, such as "Sir" or "Madam," to avoid the use of a title that would misrepresent the current situation.

The Applicant trusts that the Court will understand the profound gravity of the situation and the deep moral conflict it creates for the Applicant.

Standing of the Applicant as Principal Victim and Lay Representative for Secondary Victims:

The Applicant submits that he holds full and unqualified standing before this Court, not only as the principal victim of the miscarriage of justice herein documented, but also as the *de facto* lay representative for other individuals whose rights, liberties, and familial integrity have been directly and foreseeably destroyed by the State's unlawful actions. These individuals include, but are not limited to: the Applicant's children, family members, and those persons whose professional and personal lives have suffered serious detriment as a result of their proximity to the Applicant.

6. Grounding in Natural Justice, Constitutional Law, and Moral Belief:

It is a foundational tenet of both natural justice and constitutional jurisprudence that justice must not be confined to the actions of licensed legal professionals, particularly where access to legal representation has been rendered impossible or impractical by state failure. The Irish Supreme Court has repeatedly affirmed the right of a citizen to assert constitutional rights without counsel, especially when existing mechanisms have failed.

In The Republic of Ireland

In *State (Healy) v. Donoghue* [1976] I.R. 325, the Court held that legal representation is essential to protecting constitutional rights, and where unavailable, the right to self-representation becomes paramount.

In *O'Donoghue v. Legal Aid Board* [2004] IEHC 70, the High Court affirmed the State's duty to provide real access to legal aid and recognised the implications of systemic failure in this regard.

In the United Kingdom:

R v. Bow County Court, ex parte Pelling [1999] EWHC Admin 370 confirmed that a layperson may advocate for another in exceptional circumstances, particularly where justice would otherwise be denied.

R (McKenzie) v. McKenzie [1970] 3 All ER 1034 established the "McKenzie Friend" doctrine, which has evolved in some cases to allow broader lay involvement when fairness so demands.

7. Exceptional Circumstances Justifying Lay Standing

The Applicant asserts that the following exceptional circumstances justify his role as lay representative:

He is the primary victim and the only person with full access to the facts, record, and history of the injustices suffered;

He maintains personal knowledge of and responsibility toward the other affected individuals, 2 of whom were his minor children and are legally/morally dependent on him;

He is the only person presently capable of speaking credibly to the interconnected harms, as no effective legal representation is available due to professional misconduct, financial destitution, and systemic obstruction.

Accordingly, the Court is bound to hear the Applicant in both capacities, particularly as the violations concerned engage:

Article 6 ECHR (fair trial),

Article 8 ECHR (family and private life), and

Article 47 of the Charter of Fundamental Rights of the EU (effective remedy before a tribunal).

8. Legal and Moral Duty to Relax Formalities

Where the justice system has failed, the Court has a legal and constitutional duty to relax rigid procedural constraints to uphold substantive justice. Denying standing in this context would amount to punishing victims for the State's own failure to provide protection, representation, or redress.

9. Ethical Foundation: Tzedakah, Tikkun Olam, and Moral Responsibility

The Applicant's actions are also grounded in a deeply held moral belief system, rooted in Jewish ethical tradition, which affirms that one must act justly not only in one's own interests, but also on behalf of others. This duty arises from:

Tzedakah — not merely charity, but justice: the moral obligation to do what is right, particularly on behalf of the vulnerable and wronged;

Tikkun Olam — the imperative to “repair the world”: to take direct action to restore justice, dignity, and lawful order where they have been broken or defiled.

These principles obligate the Applicant, by personal conviction and ethical necessity, to speak not only for himself, but also for his family and professional associates, and indeed for all those rendered voiceless by the State's conduct. His actions are done in moral solidarity, professional respect, and familial love — not out of convenience or vanity, but out of deeply felt duty.

The Applicant therefore asserts standing in his own right and as *de facto* lay representative for others whose rights have been grievously violated. This standing arises from legal necessity, constitutional law, human rights obligations, and moral conscience. As such, this Court is both empowered and obliged to hear these representations and act in accordance with the principles of justice, dignity, and the rule of law.

The honourable bear witness, the silent are complicit for it is the moral duty of every citizen to stand to account for all victims, I will not be silent. PETER IVAN DUNNE!

10. Failure to protect British, Irish, Malaysian, Singaporean & Jamaican Citizens

The UK and Irish states jointly failed to protect:

Myself (as an Irish and British citizen by State attribution),

My entire family across the globe including my former fiancée and her family.

11. Statement of Claim Summary

The applicant has been subjected to unlawful detention, misrepresented judicial findings, falsified family court proceedings, perversion of justice, and coordinated misconduct across jurisdictions resulting in persecution, trauma, and extreme, irreversible damage to private and family life so severe as to meet the legal definition of torture on multiple counts at multiple times.

The entirety of this case was perpetrated on falsehoods, suppression of evidence and violations of all protections and rights.

12. Application for Waiver of Costs and Court Fees Due to Financial Emergency

12.1. Grounds of Financial Emergency and Procedural Disadvantage

The Applicant respectfully seeks the Court's recognition that he is suffering from a financial crisis so severe that he cannot afford even the cost of postage to submit printed applications.

Consequently, the Applicant is compelled to rely on email for service and filings. This necessity creates a procedural inequality and prejudice, as it limits access to justice in a system still largely structured around paper-based filing and service.

12.2. Inability to Pay Fees or Legal Costs

The Applicant has no funds available to pay any court filing fees, legal expenses, or to obtain legal representation. The Applicant and his family are at immediate risk of running out of food and basic necessities. This dire situation is a direct consequence of the unlawful and prejudicial actions detailed elsewhere in these proceedings.

12.3. Legal Basis for Relief under Irish and European Law

The right to a fair trial and access to justice is protected under:

Article 6 of the European Convention on Human Rights (ECHR) – guaranteeing access to a court.

Article 8 of the Irish Constitution (Bunreacht na hÉireann) – protecting the family and personal rights, including dignity and equality before the law.

Order 99 Rule 38 of the Rules of the Superior Courts (Ireland) – empowering courts to waive costs where the interests of justice so require.

Article 47 of the EU Charter of Fundamental Rights – which includes the right to legal aid for those lacking sufficient resources to ensure effective access to justice.

The Irish courts have held in *O'Donoghue v. Legal Aid Board* [2004] IEHC 36 that the State has a duty to provide appropriate legal aid where the interests of justice so require, and the absence of means must not be an obstacle to justice.

In the UK context, *R (UNISON) v Lord Chancellor* [2017] UKSC 51 is the leading authority affirming that fees that prevent access to justice are unlawful. The Supreme Court emphasized that access to the courts is not merely a service but a constitutional right.

12.4. Duty of the Court to Protect and Vindicate

Given the exceptional circumstances, the Applicant requests the Court to:

Waive all court fees, legal costs, and service requirements normally imposed;

Permit service and submissions by email or equivalent electronic means without penalty or procedural disadvantage;

Recognize the urgent risk to life and dignity posed by the financial emergency, and invoke its inherent jurisdiction to ensure no procedural barrier impedes access to redress.

13. Time Limits Inapplicable

No time limit can bar an action to vindicate breaches of absolute rights, including the right to a fair trial and the right to liberty.

As held under common law principles, European Convention on Human Rights jurisprudence, and Charter of Fundamental Rights:

Violations of absolute rights are not subject to limitation periods.

Time cannot cure or legitimise a conviction procured in violation of fundamental rights.

Furthermore, time cannot be relied upon where:

The State and Court continue to actively withhold material exculpatory information.

The applicant is still subject to loss of liberty and grievous personal losses.

The Rule of Speciality prohibits any restriction on liberty outside the strict terms of extradition; this prohibition is immutable and not subject to waiver or time limitation.

Fraud Principle – Taint from 2003 Onward

In *Takhar v Gracefield Developments Ltd* [2019] UKSC 13, the UK Supreme Court held that “*fraud unravels all*” and that a judgment or order obtained by fraud cannot stand, regardless of the passage of time or the principle of finality. Applied here, the demonstrably false allegation concerning a non-existent 10-year-old victim establishes that the 2003 warrant, and all subsequent documents and proceedings based upon it, are tainted by fraud from their inception. This constitutes an independent ground requiring the Court to open full examination of the warrants and proceedings, notwithstanding any delay, prior rulings, or claims of finality.

14. Declaration Sought Regarding Applicable Legal Standard and Restoration Across Jurisdictions

The Applicant, a dual British and Irish national, respectfully seeks a declaration that, due to the unique circumstances of this case, both Irish and English courts are bound to apply the higher standard of protection for private and family life, compensation, and restoration. This arises because the Applicant was extradited from the United Kingdom to Ireland without lawful authority, compelling both states to recognize and apply the higher legal standard. Applying a lower standard would impose a manifest inequality, prejudicing the Applicant relative to domestic-only cases in either jurisdiction.

14.1. Relevant Facts

1. The Applicant was a resident of England at all material times.
2. His children were born in Britain and hold British citizenship.
3. The Applicant cohabited with his former fiancée, Wendy, in England in a relationship recognized under English law as a “family” unit, invoking rights and protections under English family law, including:

Children Act 1989 (s.1: welfare of the child paramount; s.8: orders respecting children)

Recognition of cohabiting family units and protected relationships under common law principles of family life and care.

4. The Applicant holds dual British and Irish citizenship; Wendy is a British citizen.
5. The unlawful extradition of the Applicant to Ireland places both states under a shared duty to honor the higher applicable rights for purposes of restoration.

14.2. Legal Basis and Jurisdictional Principles

Irish courts must recognize the Applicant's family under English law; they are bound to apply the higher standard of protection enshrined in the Constitution of Ireland:

Article 41.3.1° – Protection of personal rights

Article 41.3.2° – Enforcement of rights and vindication through the courts

Articles 41 and 42 – Recognition and protection of the family and the institution of marriage, and duty to guard family integrity.

English courts must recognize the Irish constitutional standard for purposes of restoration and vindication, because the Applicant was illegally removed to Ireland, and applying a lower standard would impose prejudice and inequality.

Both states are bound by:

Article 8 ECHR – Right to private and family life

Article 13 ECHR (ECHR Act 2003, UK) – Right to an effective remedy

Irish constitutional provisions above, which confer a positive duty on the courts to restore, vindicate, and protect personal and family rights.

Applying a lower standard in either jurisdiction would constitute discrimination, violate equality of treatment, and perpetuate injustice arising from the unlawful extradition.

14.3 Restoration and Court Obligations

The courts must exercise their full restorative powers, recognizing the higher of the two standards for private and family life, family protection, and remedies for the Applicant and those directly affected (including Wendy and the children).

No remedy can fully undo the irreparable harms—familial, reputational, professional, personal, and psychological—but the law requires both jurisdictions to apply the higher standard to prevent further prejudice.

Failure to recognize and apply the higher standard would:

Prejudice the Applicant by denying the rights he would otherwise enjoy;

Constitute manifest inequality, violating Irish constitutional protections and ECHR guarantees;

Reinforce the unlawfulness of the extradition and subsequent proceedings.

14.4. Conclusion

Ireland must honor the Applicant's status as a family unit under English law and apply the highest applicable standard of protection for restoration and vindication.

England must apply the Irish constitutional standard and recognize Article 13 ECHR 2003 as binding, given the unlawful extradition and systemic violations.

Both states are jointly obliged to prevent prejudice arising from applying a lower standard than the other jurisdiction would recognize, ensuring equality, due process, and full restoration.

15. Declaration of Service by Email

15.1. Position of the Applicant

I, the Applicant in Person, formally demand that service by email shall constitute sufficient and effective service in these proceedings, due to the exceptional, urgent, and onerous nature of this case.

I am financially destitute, without the means to effect service by post, courier, or personal delivery across multiple jurisdictions. Additionally, I have no functional printer, preventing the production of hard copies of documents required for postal or personal service. Given these constraints, service by email is the only practical and effective option.

Under no circumstances may any foreign or residential address of the Applicant be disclosed to any person, entity, or authority in the UK or Ireland. Both nations have been irredeemably proven to constitute threats to life, liberty, and family, and there are documented cases of lethal compromise of parties in very serious matters in the past. This case is of even greater gravity than those prior instances.

15.2. Exceptional Circumstances

These proceedings span multiple jurisdictions (UK, Ireland, and other cross-border authorities).

The number of respondents includes multiple government bodies, police forces, local authorities, and courts.

The litigation involves substantial documentary evidence, which would require resources I do not possess.

Postal and courier services are prohibitively expensive and logistically impossible given my displacement from both the UK and Ireland.

All relevant respondents have verified email addresses previously used for legal correspondence, ensuring that email service will reach them effectively.

15.3. Legal Basis for Sufficiency of Service by Email

(a) UK Proceedings

Under CPR 67.15(2), the court may declare service effective when an alternative method is used and has brought the documents to the respondent's attention.

Given that respondents' email addresses are known and verified, have previously been used for correspondence, and that service by email is immediate and direct, service by email satisfies CPR 67.15 and achieves the procedural objective of informing respondents properly.

(b) Irish Proceedings

Under the Rules of the Superior Courts, Order 121, Rule 3 allows substituted service where ordinary service is "impractical or impossible."

Given urgent deadlines, lack of printing facilities, financial constraints, and the cross-border nature of these proceedings, service by email is the only viable and effective method.

15.4. Article 6 ECHR / HRA 1998 and Constitutional Guarantees

Failure to recognise service by email would deny access to justice, breaching:

Article 6 of the European Convention on Human Rights (incorporated into UK law via the Human Rights Act 1998);

Articles 41.3.1 and 41.3.2 of the Irish Constitution, obliging the State to protect personal rights.

Where a litigant in person has no financial means, no access to a printer, and no practical alternative, courts must ensure procedural technicalities do not obstruct a fair hearing.

15.5. Declaration Sought

Accordingly, I declare that:

1. Service by email on all respondents and interested parties shall constitute sufficient and effective service;
2. Service is deemed effected upon successful transmission to the respondents' last known and active email addresses;
3. No foreign or residential address of the Applicant shall be disclosed to any UK or Irish authority or party, given the proven threats to life, liberty, and family;
4. This declaration applies to filings before the UK High Court, Irish High Court, and any related cross-border proceedings.

15.6. Summary

In light of:

- Severe financial destitution;
- Displacement from the UK and Ireland;
- No functional printer;
- The exceptional cross-border nature of the case; and
- Verified respondent email addresses —

Service by email is the only practical, effective, and legally sufficient method.

15.7. Lack of Impartiality and Inadequate Remedy

The magnitude of harm inflicted by the UK and Irish authorities, including police, Gardaí, prison services, and the courts (District, Circuit, High, Court of Appeal, and relevant UK tribunals), is such that no legal or procedural remedy can restore the Applicant's life.

Despite breaches of Article 6 ECHR (*Ringeisen v Austria* (1971) 1 EHRR 455), no Irish or British court can provide an impartial tribunal. This Court remains the only avenue for even minimal restoration.

The Applicant's relationships with his estranged wife, Choi Yeng, former fiancée Wendy, and children Nathan and Rebecka have been irreparably harmed (*Anufrijeva v Southwark LBC* [2003] EWCA Civ 1406).

The systemic violations demonstrate that any remedy by the Court is tragically insufficient to restore the Applicant's life, reputation, or family bonds (*Keegan v Ireland* (1994) 18 EHRR 342).

16. Interference with Legal Correspondence

In addition, the Applicant was subjected to extensive interference with legal correspondence, including correspondence with his solicitors, this and other courts, including the European Court of Human Rights.

16.1. This interference constitutes a grave violation of:

- Article 6 ECHR (right to a fair trial) — see *Campbell v United Kingdom* (1992) 15 EHRR 137;
- Article 8 ECHR (right to private life and confidential communication) — see *Foxley v United Kingdom* (2001) 31 EHRR 638.

Despite this being raised on application, the Irish and British courts failed to address or remedy the interference, further substantiating the systemic failure of the judicial system.

16.2. Violation of Religious Rights and Improper Judicial Conduct

Moreover, when the Applicant sought redress for the denial of access to kosher food — a violation of Article 9 ECHR (*Jakóbski v Poland* (2010) 51 EHRR 9) — the presiding judge demanded that the Applicant provide a list of his Jewish books and details of his religious background as a precondition to considering his complaint.

16.3. This action was wholly improper and constituted a direct breach of:

Articles 6, 8, and 9 ECHR — see *Buscarini v San Marino* (1999) 30 EHRR 208;

Articles 41.3.1° and 41.3.2° of the Constitution of Ireland, which impose a positive duty to defend and vindicate personal rights (*McGee v Attorney General* [1974] IR 284).

It wrongfully shifted the burden onto the Applicant to defend and vindicate his own constitutional rights, in flagrant breach of the positive duty imposed upon the courts under *The State (Healy) v Donoghue* [1976] IR 325 and reaffirmed in *Damache v Minister for Justice* [2012] IESC 14.

16.4. Chilling Effect and Denial of Justice

This coercive demand forced the Applicant to withdraw his kosher food complaint under duress and had a severe chilling effect on the applicants willingness and ability to bring further applications, including the present application.

The Irish and British courts' failure to proactively defend the Applicant's rights, as required under Article 13 ECHR (*Kudła v Poland* (2000) 35 EHRR 11), directly contributed to the continuation of injustice.

16.5. Conclusion

Accordingly, while a limited obligation to provide restoration remains, the profound and irreparable damage inflicted on the Applicant's:

Reputation,

Dignity,

Family life, and

Religious rights

lies well beyond the reach of any effective remedy that this or any Irish or British Court could provide (*B v United Kingdom* (2001) 33 EHRR 205).

16.6. Key Authorities Cited

ECHR — Articles 6, 8, 9, and 13
Human Rights Act 1998 [UK]
Constitution of Ireland — Articles 41.3.1°, 41.3.2°
Ringeisen v Austria (1971) 1 EHRR 455
Campbell v United Kingdom (1992) 15 EHRR 137
Foxley v United Kingdom (2001) 31 EHRR 637
Jakóbski v Poland (2010) 51 EHRR 9
Keegan v Ireland (1994) 18 EHRR 342
Buscarini v San Marino (1999) 30 EHRR 208
The State (Healy) v Donoghue [1976] IR 325
McGee v Attorney General [1974] IR 284
Damache v Minister for Justice [2012] IESC 14
Kudła v Poland (2000) 35 EHRR 11
B v United Kingdom (2001) 33 EHRR 205

17. Judicially Ordered Immunity for Distressed Witness: Wendy Sebrina Dixon (aka Wendy Timmis)

I, the Applicant in Person, request that the Court grant full judicially ordered immunity to Wendy Sebrina Dixon (aka Wendy Timmis), my fiancée at the time of my arrest, for all matters related to these proceedings. Wendy is a critical witness whose testimony touches every major issue in this case and is essential to establishing the truth of multiple violations of law and human rights across both the UK and Ireland.

17.1. Legal Basis for Immunity

United Kingdom: Under Crown Prosecution Service (CPS) policy and common law principles (*R v Turner* [1970] 2 QB 321; *R v Hasan* [2005] UKHL 22), judicially ordered immunity or formal undertakings may be granted to witnesses whose testimony is essential and who risk prosecution due to circumstances beyond their control.

Ireland: Under Irish law, the Director of Public Prosecutions (DPP) may grant or request judicially recognised immunity (*The People (DPP) v Gilligan* [2005] 2 IR 593), and courts hold inherent jurisdiction to order such immunity to ensure truthful testimony.

Given that police, CPS, Gardaí, and the DPP are complicit in the injustices underlying this case, judicial immunity must be ordered by the Court; prosecutorial discretion cannot be relied upon.

17.2. Relevant Factual Background

1. Wendy was my fiancée at the time of my arrest and a direct witness to false allegations and procedural abuses.
2. She was present at Nuneaton Magistrates' Court when the false claim of a "10-year-old victim" was first made.
3. Later, at an Irish District Court hearing (Waterford or Kilkenny), Wendy attended when the Book of Evidence (BOE) was served. With my mother and sisters present, she verified the BOE, confirming the alleged victim was actually 20 years old, proving the UK claim was false and based on a completely different case.
4. Wendy can attest that the destruction of our relationship was caused entirely by this case and the pressure and harassment it generated.
5. Police attended Wendy's apartment on Constitution Hill, Birmingham, after I reported serious security concerns for her safety in 2005.
6. On 10 October 2005, I suffered an attempted hanging — an act of attempted murder directly correlated to the threats and circumstances surrounding Wendy's safety and the broader campaign against us.
7. I tried in 2013 to contact Wendy as she remained an essential witness and again in 2021 due to the immediate threat to my family and I posed by state actors.
8. Wendy called me, threatened me and blackmailed me, it was overheard by a friend whose witness statement I have, he is now deceased.
9. She also made demonstrably false police reports.
10. Based on the specific wording and apparent emotional state of Wendy in a phone call threatening me, I am prepared to accept she was acting under duress or profound fear for herself and her daughter.
11. Around 2006, Wendy and her sister made unfounded harassment claims leading to a discontinued prosecution at Birmingham Magistrates' Court, evidencing the severe distress and duress they experienced.

17.3. Rationale for Immunity

Wendy is a critical witness to:

The false “10-year-old” victim allegation covering both Extradition hearings in the UK and the Trial in Ireland.

The true BOE contents, disproving UK claims;

The Family law matters involving my son before the Coventry County Court, Family Law Division.

The Family law matters involving my daughter before the Newcastle County Court, Family Law Division.

The direct effect on our relationship;

Police attendance and security concerns for her and her daughter.

Without immunity, Wendy faces risk of prosecution or harassment that may prevent truthful testimony. Because law enforcement and prosecutorial bodies are complicit, only judicial immunity will guarantee her protection. Her testimony may clarify statements made under duress or fear, ensuring full context is understood.

In high profile miscarriage cases there is a well documented history of interference with family members, key witnesses and others closely associated with such cases, therefore the threat to her safety is very real and knowable.

17.4. Legal and Constitutional Significance

Wendy’s statements were later entered into the County Court, Family Division, creating a paper trail which — without judicial intervention — leaves her exposed to scapegoating and retaliatory prosecution by the same state actors responsible for the wider injustice. Her testimony is essential to:

Establish that we were cohabiting in Birmingham, invoking enhanced family rights under English law and protections under Articles 41 and 42 of Bunreacht na hÉireann, which recognise the family as “the natural primary and fundamental unit group of Society” and pledge to “guard with special care the institution of Marriage, on which the Family is founded, and to protect it against attack”;

Prove the UK and Ireland knowingly acted ultra vires and in matters void ab initio;

Evidence the harm done to my wider family relationships, including with my son;

Confirm that my Article 5 and Article 6 ECHR rights were violated from the first arrest;

Allow Wendy to redeem herself morally and legally, as her earlier false statements and fear-driven conduct can now be corrected through full, honest testimony.

Clear the record for myself and my family.

Her right to compensation and redress for harms to her and her daughter must be conditioned only on her honest testimony. Her immunity must be unconditional, as no fair or just proceeding could occur against her given the complicity of police, prosecution, and the judiciary in both jurisdictions.

17.5. Consequences of Denying Immunity

Denying immunity would:

Suppress essential testimony and create further breaches of Articles 6, 13, 14, and 17 ECHR 2003 and Articles 6, 14, and 17 HRA 1998;

Deny Wendy her own right to compensation and redress;

Breach Articles 41 and 42 of the Constitution of Ireland, continuing to destroy recognised family bonds;

Leave her vulnerable to scapegoating by those whose misconduct she must testify about.

There is no prospect she could have fair hearing due to the extreme abuse in this case, it would taint any hearing involving Wendy.

There is no agency with clean hands to take any case against her, as such, any action would be manifestly unlawful.

17.6. Relief Sought

The Court is respectfully asked to: (for its jurisdiction)

1. Issue a judicial direction in both the UK and Ireland granting full, unconditional immunity to Wendy Sebrina Dixon for all historic and incidental matters tied to these proceedings;
2. Confirm that no prosecution, investigation, or liability shall attach to her testimony or past conduct in this and related matters;
3. Acknowledge that Wendy's right to compensation is conditioned solely on her honest testimony, while her immunity is granted outright due to the collapse of judicial impartiality;
4. Recognise that Ireland's constitutional obligations under Articles 41 and 42 to protect the family and the institution of marriage are directly engaged by Wendy's testimony, and that denying her immunity would perpetuate a constitutional breach.

77.7 Witness Details

Wendy Sebrina Dixon AKA Wendy Timmis

Nationality: British & Jamaican

Date of Birth: 06/01/1985

National insurance number: PW 84-40-91-D

previous addresses

FLAT 105, CONSTITUTION HILL, BIRMINGHAM

36 HOPLEYS CL, TAMWORTH, B77 3JU

181 PARKESTON CRESCENT, BIRMINGHAM, BIRMINGHAM, B44 0PG

Last known address

39 Muirhead Ave, Falkirk FK2 7SQ

Email Wendydixon307@yahoo.com

Telephone Home: +44 755 4075 775

18. Primacy of Inalienable Rights and Duty to Vindicate and Restore

Both the Constitution of Ireland and the Human Rights Act 1998 in England & Wales enshrine the principle that **fundamental human rights are inalienable and take precedence over statutory frameworks**. Where violations occur, the courts are under a binding duty not only to prevent further breaches but to **vindicate and restore** rights already denied.

A. Ireland – Constitutional Framework and the ECHR Act 2003

18.A.1. Constitutional Primacy

Article 41.3.1° of the Constitution of Ireland:

“The State guarantees in its laws to respect, and, as far as practicable, by its laws to defend and vindicate the personal rights of the citizen.”

This establishes that constitutional rights have primacy over statutory instruments such as the European Arrest Warrant Act 2003 or the Backing of Warrants Act.

18.A.2. Duty to Vindicate and Restore

The courts recognise that rights under Article 41.3 extend to unenumerated rights inherent in human dignity:

McGee v AG [1974] IR 284 – constitutional rights include unenumerated rights.

The People (DPP) v Shaw [1982] IR 1 – personal rights include dignity and fairness.

Rights to fair process and representation flow directly from Article 41.3:

State (Healy) v Donoghue [1976] IR 325 – right to legal representation is constitutionally protected.

Damache v Minister for Justice [2012] IESC 11 – warrants lacking independence violate constitutional safeguards.

Evidence obtained in breach of constitutional rights cannot be relied upon:

J.C. v DPP [2015] IESC 31 – evidence gathered in breach of rights is presumptively inadmissible.

18.A.3. Extradition Obligations and Human Rights

Irish courts must refuse extradition if there are substantial grounds for believing there is a real risk of inhuman or degrading treatment:

Minister for Justice v Rettinger [2010] IESC 45 – refusal required where Article 3 ECHR risk exists.

The Irish duty is proactive: where extradition frameworks produce defective warrants, denial of notice, and destruction of family life, the State must halt proceedings and restore rights under Article 41.3.

B. England & Wales – Human Rights Act 1998 and Case Law

18.B.1. Statutory Primacy of Rights

HRA 1998, Section 6: unlawful for any public authority to act incompatibly with ECHR rights.

HRA 1998, Section 3: courts must interpret legislation compatibly with ECHR rights “so far as it is possible to do so.”

18.B.2. Case Law Affirming Primacy

R v Secretary of State, ex p Daly [2001] UKHL 26 – rights cannot be curtailed beyond strict necessity.

A v Secretary of State (Belmarsh) [2004] UKHL 56 – indefinite detention found incompatible with Article 5; shows that courts will invalidate detention regimes violating liberty.

R (Ullah) v Special Adjudicator [2004] UKHL 26 – extradition barred where there is a real risk of Article 3 violations.

Othman (Abu Qatada) v UK (2012) 55 EHRR 1 – extradition prohibited if there is risk of a flagrant denial of justice (Article 6).

EM (Lebanon) v Secretary of State [2008] UKHL 64 – extradition blocked where it would disproportionately interfere with family life (Article 8).

Soering v UK (1989) 11 EHRR 439 (ECtHR) – extradition barred where the individual faces inhuman treatment abroad.

Hirst v UK (No.2) (2006) 42 EHRR 41 – demonstrates that structural incompatibility with ECHR rights demands legislative reform.

18.B.3. Extradition and Vindication Duty

In line with Belmarsh and Soering, UK courts are empowered to suspend extradition regimes that result in systemic violations of Article 3 (inhuman treatment), Article 5 (arbitrary detention), and Article 6 (denial of fair trial).

EM (Lebanon) confirms that family life (Article 8) requires proportionate consideration; wholesale, permanent destruction of family ties is not a lawful interference but a complete negation.

The HRA duty is remedial as well as preventative: where systemic violations are proven, courts must provide effective relief, including halting extradition entirely.

18.C. Non-Derogable and Qualified Rights

Non-derogable rights: Articles 2 (life), 3 (prohibition of inhuman treatment), 5 (liberty), and 6 (fair trial). These cannot be suspended under any circumstance.

Qualified rights: Articles 8 (family life) and 9 (freedom of thought/conscience). Interference is lawful only if proportionate, necessary, and consistent with democratic principles.

In the present case, the breaches are not proportionate restrictions but wholesale negations:

Article 3 – permanent separation from family amounts to inhuman and degrading treatment.

Article 5 – 22 years of arbitrary detention threats and defective warrants.

Article 6 – 22 years of denial of fair trial rights (no counsel, no disclosure).

Article 8 – complete and permanent destruction of family life.

18.D. Unified Constitutional Duty

Both Ireland and England & Wales recognise that the primacy of inalienable rights obliges courts not merely to avoid further violations but to actively vindicate and restore rights already denied:

In Ireland, this duty arises under Article 41.3.1° of the Constitution and the ECHR Act 2003, with strong authority from *Healy*, *Damache*, *Rettinger*, *Shaw*, *McGee*, *J.C. v DPP*.

In England & Wales, it flows from Sections 3 and 6 of the HRA 1998, supported by *Daly*, *Belmarsh*, *Ullah*, *Abu Qatada*, *EM (Lebanon)*, *Soering*, *Hirst*.

19. JUDICIAL PERJURY AND CROSS-JURISDICTIONAL LIABILITY: BREACH OF SOVEREIGN IMMUNITY AND STATE SOVEREIGNTY

The deliberate false statements (i.e. judicial perjury) made by Irish judges William Harnett and Michael Peart in connection with English judicial processes, while acting within Irish jurisdiction, constitute not only criminal misconduct but a direct transgression of both Irish constitutional law and English criminal law. These actions transcend territorial boundaries and expose both the judges and the State to criminal and civil liability under Irish, UK, and international law. They shatter the traditional concept of judicial immunity and undermine the sovereignty of both States involved.

20. Cross-Jurisdictional Analogy and Dual-Liability Principle

This is legally analogous to a sniper positioned north of a border shooting a person south of the border. The shooter cannot claim immunity simply because the act originated outside the jurisdiction of harm. In legal terms, both the *actus reus* (the wrongful act) and the *mens rea* (intention) establish liability in both the originating and affected jurisdictions.

Judicial perjury committed in Ireland with direct, deliberate effect on UK judicial outcomes is actionable under:

Perjury Act 1911 [UK] – criminal offence for knowingly giving false evidence in judicial proceedings;

Irish criminal and constitutional law [IE] – perjury is a crime; judicial misconduct violates constitutional guarantees under Articles 34, 40 and 30.

Case law confirms that judicial immunity does not protect malicious or unlawful conduct:

Sirros v Moore [1975] QB 118 [UK] – judicial immunity applies only to acts made in good faith; malicious or jurisdictionally improper acts are not protected.

Anderson v Gorrie [1895] 1 QB 668 [UK] – judges may be sued for acts done “maliciously and without reasonable and probable cause.”

R v Connolly [1964] 1 QB 185 [UK] – magistrate prosecuted for perjury, confirming judges can face criminal liability.

Irish law is founded upon the Constitution of Ireland (Bunreacht na hÉireann), which is binding, not aspirational. This is critical:

21. Foundational Constitutional Authority (Ireland)

Article 30.3 and 30.6 affirm that international law is binding upon Ireland, and the State shall respect its international obligations. This includes cross-border justice cooperation and adherence to fair trial norms.

Article 41.3.1 guarantees the protection of personal rights, including due process and fair treatment. Judicial perjury inherently violates these protections.

Article 34 establishes the courts as the guardians of justice. When judges themselves breach that duty, the entire constitutional order is tainted.

Irish Supreme Court rulings reinforce this obligation:

Re A Ward of Court (No. 2) [1996] 2 IR 79 – confirmed the courts’ inherent jurisdiction to act when the State fails to uphold justice, even against its own organs.

Maguire v Ardagh (Abbeylara) [2002] IESC 21 – the Constitution is binding on all state organs; actions beyond those limits are reviewable.

During the period in question, two extraditions (2003 and 2008) were governed by:

22. Extradition, Sovereignty, and Treaty Law

Extradition Act 1965 (Ireland) – primary statute for extradition, incorporating principles like the rule of speciality.

Backing of Warrants (Republic of Ireland) Act 1965 – permitted UK warrants to be executed in Ireland.

European Arrest Warrant Act 2003 – implemented the EU EAW framework, retaining constitutional safeguards.

UK Extradition Act 2003 – applied to both extraditions.

UK Backing of Warrants (Republic of Ireland) Order 1969 – bilateral warrant enforcement before full EAW operation.

The **rule of speciality**—a cornerstone of extradition law—prohibits States from misusing or distorting the basis of surrender. Perjury in judicial representations to secure extradition violates this principle outright.

Ireland and the UK were bound by international human rights and treaty obligations during this

period: **23. International Law and State Responsibility**

European Convention on Human Rights (ECHR) – incorporated into Irish law via the ECHR Act 2003 and UK law via the Human Rights Act 1998. Article 6 ECHR guarantees a fair trial. Judicial perjury annihilates this guarantee.

International Covenant on Civil and Political Rights (ICCPR) – binds both States; Article 14 ensures fair trial, Article 2 requires an effective remedy.

State responsibility for judicial misconduct is firmly established:

Jones v Ministry of Interior of Saudi Arabia [2006] UKHL 26 – sovereign immunity does not extend to grave breaches of fundamental rights.

R v Bow Street Magistrates Court, ex parte Pinochet (No. 3) [2000] 1 AC 119 – heads of state (and by analogy, judges) can be held personally liable for acts like torture; official position does not shield serious crimes.

Re McC (an Infant) [1985] IR 528 – Irish SC affirmed that courts and judges are subject to constitutional limits and accountability.

24. UK Domestic Law: Perjury and Due Process

Under UK law, importing false judicial statements from an Irish court into English proceedings is a criminal matter:

Perjury Act 1911 – makes giving false testimony under oath an offence.

Police and Criminal Evidence Act 1984 (PACE) – requires evidence to be lawfully obtained and truthful.

Human Rights Act 1998 – embeds ECHR rights, including Article 6 (fair trial), into UK law.

Judges who fabricate or misrepresent evidence step outside judicial functions and can face prosecution (see *R v Clark (Anthony)* [2003] EWCA Crim 1020, where a judge was convicted of perverting the course of justice).

25. Collapse of Immunity and Dual Responsibility

The actions of Judges William Harnett and Michael Peart amount to judicial perjury with transboundary effect. Their conduct:

- Breaches the Irish Constitution, particularly Articles 29 and 40;
- Violates Irish and UK statutory law, including perjury and extradition legislation;
- Engages State liability under international human rights law;
- Triggers obligations under the rule of speciality and due process protections under the European Arrest Warrant framework;
- Breaks sovereign immunity, as criminal misconduct is not shielded under international norms.
- Opens the door to dual filing under a single unified application before the Courts of England and Ireland as these actions amount to simultaneous violation of law in both jurisdictions.

Both Ireland and the UK have non-discretionary duties to investigate and prosecute such misconduct. The actions of these judges have fundamentally breached the sovereign integrity of the Irish State and the legal credibility of the UK judicial process.

26. HUMAN RIGHTS ACT & ECHR VIOLATIONS

ARTICLE 2 – RIGHT TO LIFE

On 10 October 2005, I was the target of a hanging attack with clear terrorist, racist, and antisemitic overtones. My life was placed in immediate danger, and the State failed in its positive duty to investigate or to provide any protection afterward.

I was repeatedly given food in prison containing pork or onions, being poisoned multiple times, nothing short of attempted murder by allergen.

This was most specifically Cork Prison 2003, however I was also violated at the Westminster Magistrates Court when given non kosher food containing onion within the court building, the court was shown the food packets by me personally, placing the violation on the Judicial record. The state never provided effective means to report, investigate or vindicate these crimes.

27. ARTICLE 3 – PROHIBITION OF TORTURE, CRUEL, INHUMANE AND DEGRADING TREATMENT

The harm I have suffered is cumulative, intentional, and continuing.

I was poisoned.

I was raped.

I was denied kosher food immediately upon both extraditions — in 2003 and again in 2008 — a deliberate, sanctioned act.

My family was systematically dismantled:

- I lost my son permanently by court judgement in 2006.
- I lost my Black, British-Jamaican fiancée in 2005.
- I lost all contact with my Irish family, save limited contact with one member
- I lost all contact with my Malaysian family.
- I lost all contact with my Singapore famil.
- I lost all contact with my ex fiancée's British Jamaican family
- In early 2025, I lost my Malaysian, Buddhist wife and my mixed-race British-Malaysian daughter after years of family law interference and harm. My daughter was also held in state care for a year in 2021-2022.

The hanging attack of 2005 caused lasting amnesia and frozen memories — a permanent physiological and psychological wound of such magnitude that it amounts to a continuing form of torture.

27.1. Violation of Articles 2 and 3

My current circumstances constitute grave violations of Articles 2 and 3 of the Human Rights Act 1998 ([uk]) and the European Convention on Human Rights 2003 ([ie]).

Both the United Kingdom and Ireland have not merely failed in their obligations, but have engaged in the deliberate, planned destruction of my family's ability to survive anywhere within their

jurisdictions or Europe at large. For over a year, this sustained state-inflicted cruelty and psychological harm have left me, my wife, and my daughter without any means to maintain shelter, sustenance, income, or basic dignity.

This extreme interference has been so severe that my wife and daughter have been compelled to leave Europe entirely, seeking safety elsewhere. I am now compelled to do the same, invoking Israeli law and protections, as it is clear that we are unsafe anywhere in Europe, regardless of any pending applications or official assurances.

The Governments of both states have effectively engineered a situation tantamount to attempted murder by orchestrating non-survivable conditions through acts and omissions of the gravest nature.

These actions represent a flagrant breach of:

Article 2 ECHR/HRA (Right to Life): imposing positive obligations on states to protect life from arbitrary deprivation.

Article 3 ECHR/HRA (Prohibition of Torture and Inhuman or Degrading Treatment): forbidding any treatment causing severe physical or mental suffering.

This is not mere neglect; it is state-inflicted torture & intentional harm designed to destroy our ability to live in safety and dignity within the UK, Ireland, or Europe.

27.2. ARTICLE 5 – RIGHT TO LIBERTY AND SECURITY

I have suffered arbitrary loss of liberty through abuse of process, not lawful detention.

I was extradited twice (2003 and 2008) on false and withheld evidence.

I was given two conflicting Sex Offender Registration orders for a conviction and sentence belonging to an entirely different person.

I was subjected to a Green Notice more than 11 years after conviction, and over 8 years after I had left Ireland.

These actions violate Article 5 and the core principle that liberty must not be arbitrarily stripped by fabricated processes.

27.3. ARTICLE 6 – RIGHT TO A FAIR TRIAL

My right to a fair trial was denied from the outset and remains violated:

1. At the sentencing hearing, I was compelled to represent myself because counsel on record failed to appear.
2. During trial, the solicitor and barrister were switched between the first and second day of trial without notice and without my consent — a clear breach of my right to effective representation.
3. The admissions by Sgt Wheelan detailed in transcript of the sentencing hearing remain withheld.
4. In that hearing, Sgt Wheelan admitted that none of the identifying information matched me and that he knew of no case involving a child.
5. The 2007 Certificate of Conviction and Sentence is exculpatory:
6.
 - It contains a different date of birth.
 - It refers to a different person entirely.
 - It was signed and dated 11 days before the trial took place.
7. The continued refusal to release the full, unaltered transcript and to issue the true 2007 Certificate of Conviction & Sentence constitutes a live, ongoing breach of Article 67.
8. The rule of speciality remains in ongoing violation

27.4. ARTICLE 8 – RIGHT TO PRIVATE AND FAMILY LIFE

My family life has been deliberately and systematically destroyed:

I lost my son in 2003, permanently severed by court judgment in 2005.

I lost my fiancée in 2005.

I lost all connection with my Irish family save limited contact with one person.

In 2025, I lost my wife and daughter after years of family law interference and engineered breakdowns.

These are not disconnected events but a pattern of deliberate harm to my private and family life.

27.5. ARTICLE 9 – FREEDOM OF RELIGION

Kosher food was deliberately denied to me **immediately upon both extraditions**. This was not logistical oversight — it was sanctioned deprivation of religious practice, a breach of Article 9.

27.7. ARTICLE 13 – RIGHT TO AN EFFECTIVE REMEDY, IRISH ECHR ACT 2003, NOT IN THE HRA1998 but binding regardless due to the extradition.

No effective remedy has been given at any stage:

Key transcripts remain withheld.

False orders remain on file.

Appeals have been obstructed and ignored.

I remain without legal counsel

Article 13 is breached because the legal system has actively denied all avenues to correct the wrongdoing.

Extradition brings with it obligations on both nations, the extradited person is entitled to redress in both the UK and Ireland to not less than the higher standard of the two nations regardless of where the violation was occasioned.

27.7. ARTICLE 14 – PROHIBITION OF DISCRIMINATION

Discrimination has been constant and cuts across racial, religious, and national lines.

My son is Jewish and British.

My wife is Asian, Malaysian, and Buddhist.

My daughter is mixed race, British-Malaysian.

My former fiancée is Black, British-Jamaican, and Christian.

The cumulative targeting of me and my family shows direct racial, religious, and cultural discrimination, violating Article 14.

27.8. ARTICLE 17 – PROHIBITION ON ABUSE OF RIGHTS

The law itself was weaponised against me.

False extraditions.

Fabricated conviction documents.

Two conflicting registration orders for another person's conviction.

Family law used to destroy my household.

This is exactly the kind of abuse Article 17 forbids.

27.9. ARTICLE 1 OF PROTOCOL 1, ECHR2003, hra 1998

“Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided by law and by the general principles of international law.”

I have repeatedly lost my homes and property due to this miscarriage and associated abusive cases and actions

28. VERIFIED IDENTITY OF PETER IVAN DUNNE

attachmentsA.pdf

My identity is established and certified beyond dispute:

Full Name: Peter Ivan Dunne

Date of Birth: 24 October 1964

Place of Birth: Summerhill, Enniscorthy, County Wexford, Ireland

This identity is confirmed and documented by:

Irish Birth Certificate – issued by the Irish civil registry, showing my full legal name and date of birth and original address.

Irish Passport – issued by the Government of Ireland, carrying the same name and date of birth.

UK Driving Licence – issued under the same identity and date of birth.

Court Filings – entered into record in:

UK Family Law Courts

UK Courts

Irish Courts

Numerous procedural filings in both jurisdictions

All copies of these identity documents have been entered into the court record without challenge in the UK and Ireland in the Family Court, Northumberland, England, Circuit Court Nenagh, Ireland (birth certificate and testimony), Court of Appeal, Dublin, Ireland.

No agency, court, or government department has ever disputed that my legal identity is Peter Ivan Dunne, born 24 October 1964, of Summerhill, Enniscorthy, County Wexford, Ireland.

This verified identity is the benchmark against which all warrants, orders, and certificates must be tested.

Any document bearing a different name, date of birth, or address is inherently defective and cannot lawfully attach to me.

29. DNA RETENTION ORDERS – IDENTITY AND LEGAL FAILURES

attachmentsA.pdf

29.1 Three High Court DNA retention orders were made in Ireland. Each of those orders lists the subject as:

“Peter Dunne, originally of Moyne Lower, Enniscorthy, County Wexford, Ireland.”

29.2 This description does not identify me. It is **factually incorrect and exculpatory**. I am from **Summerhill**, not Moyne Lower. Under Irish law, the point of origin is an exclusive and immutable element of identity. An incorrect point of origin removes any evidential link between the orders and myself. These orders therefore do not identify me and are **exculpatory**.

29.3 This principle is confirmed by:

- **People (DPP) v O’Shea [1982] IR 384 [IE]** — affirming that fundamental fairness in identification is required and that absence of correct identification renders an order incapable of attaching to the subject.

Service and Procedural Defects

29.4 Each DNA order was to be served on the subject with leave to appeal on notice.

29.5 None of the orders show a service address.

29.6 None were served.

29.7 There is no proof of service, no affidavit of service, and no evidence I was ever notified.

29.8 Failure to serve the first order means it was **void ab initio**.

29.9 This principle is established by:

- **State (McDonagh) v Frawley [1978] IR 131 [IE]** — an invalid foundation vitiates all later acts dependent upon it.

29.10 The second and third orders depend entirely on the first order. Because the first order is void, the second and third orders are likewise void. Proceeding in this way constitutes **contempt of court**.

Invalid English Address

29.11 The orders list an English address containing an **invalid postcode** that does not exist in law.

29.12 An address in a court order must be accurate and capable of verification. An invalid postcode renders the address legally ineffective.

29.13 This further confirms that these orders cannot identify me and reinforces their exculpatory nature.

Omissions of Date of Birth and Middle Name

29.14 The orders omit my **date of birth** and **middle name**, both of which are essential identifiers.

29.15 Under Irish law, orders must identify a subject with clarity and certainty to avoid misidentification and miscarriage of justice.

29.16 Omission of such identifiers is a substantive defect that reinforces the fact that the orders do not identify me and are therefore **exculpatory**.

Non-Disclosure of Exculpatory Material

29.17 The DNA retention orders were never disclosed to the UK courts in 2003 or 2008.

29.18 They are material exculpatory evidence because they do not identify me and would have materially undermined the warrants upon which extradition was sought.

29.19 Irish law requires disclosure of exculpatory material:

- **The People (DPP) v Special Criminal Court [1999] 1 IR 60** — requiring disclosure of evidence favourable to the defence.

29.20 UK law similarly requires disclosure:

- **PACE 1984 ss.76 and 78** — requiring disclosure of material relevant to the fairness of proceedings.

29.21 Suppressing these orders from two extradition hearings amounts to a **perversion of the course of justice**.

Article 6 ECHR Breaches

29.22 Each unserved order represents a denial of the right to challenge evidence. This is **three separate breaches** of Article 6 of the European Convention on Human Rights (fair trial).

29.23 **Re Haughey [1971] IR 217 [IE]** — affirms the right to confront and answer evidence.

29.24 Custody records contained contradictory and withheld information, including a date of birth of 7/5/1961 and a description of “sandy hair,” which were not disclosed to the extradition courts.

29.25 This amounts to **five breaches of Article 6 ECHR / HRA 1998 and PACE in 2003**, and **five further breaches in 2008** at Westminster Magistrates’ Court and the High Court (Administrative Division).

Consequences

29.26 On the basis of the foregoing:

- These orders describe a man from Moyne Lower, not Summerhill.
- They contain an invalid English address.
- They omit my date of birth and middle name.
- They were never served.

- They were suppressed from disclosure.

29.27 Each of these defects independently confirms that these orders do not identify me and are **exculpatory**. Taken together, they amount to a complete collapse of the legal basis for the orders.

29.28 Because the **first order was never served and is procedurally defective**, it is **void ab initio**.

29.29 The second and third orders, being dependent upon the first, are likewise void.

29.30 Therefore, anything depending upon them — warrants, extradition applications, conviction documentation, or sex offender registration — is equally compromised and unenforceable.

30. Scientific Evidence, DNA Methodology, and Persistent Non-Disclosure

Following the discussion of the DNA retention orders, it is essential to address the fundamental inadequacy and systematic non-disclosure of scientific evidence underlying the purported identification of the defendant.

1. The Irish Book of Evidence and the 10-Column Chart

A 10-column chart with five entries each, contained in the Irish book of evidence, was presented in the Irish proceedings to assert the prospect of paternity of one man while excluding another.

While the chain of custody for the DNA samples was disclosed in Ireland, the full supporting document detailing laboratory procedures, scientific methodology, probability calculations, and underlying data was never disclosed—neither to the UK courts nor fully in Ireland.

The chart alone cannot establish paternity or identity with any evidential reliability. Its presentation without the supporting documentation renders it inherently insufficient.

2. Legal Requirements for DNA Evidence

Irish law: DNA evidence must be fully documented, with laboratory records and methodology disclosed to allow meaningful challenge: *DPP v Doyle* [2000] 3 IR 101; *DPP v Fitzpatrick* [1998] 2 IR 1.

UK law: Under PACE 1984 ss.76 and 78, DNA evidence must be verifiable, reliable, and disclosed to the accused, providing sufficient detail to permit proper challenge: *R v Doherty* [1997] 1 WLR 212 (CA).

The simplified 10-column chart fails to meet these evidential standards, as it lacks the underlying scientific documentation required by both jurisdictions.

3. Deliberate Non-Disclosure and Ongoing Breach

The full supporting methodology and laboratory records were deliberately withheld. Suppressing this material in both Ireland and the UK denied the defendant the opportunity to confront and challenge evidence, constituting a continuing violation of Article 6 ECHR (right to fair trial).

Non-disclosure of exculpatory material is a recognized breach under Irish law: *The People (DPP) v Special Criminal Court* [1999] 1 IR 60, and under UK law via PACE 1984 s.78.

By withholding the evidence, the prosecution prevented the courts from properly assessing reliability, accuracy, and relevance, resulting in systemic miscarriage of justice.

4. Consequences for the Proceedings

Any reliance on the chart or derivative conclusions in extradition applications, warrants, convictions, or related proceedings is legally unsustainable.

The deliberate non-disclosure, in combination with the previously identified DNA retention order violations, compounds the systemic abuse of justice over the 22-year period, and demonstrates ongoing failure to comply with both Irish and UK legal obligations.

This establishes that the evidential basis for the DNA-related aspects of the case is fundamentally compromised, and that the courts have been prevented from making informed, fair determinations.

31. Custody Records: Legal Analysis

attachmentsA.pdf

31.A. Custody Record 1

Name: Peter Dunne

Address: 3 Charlotte St, Rugby, CP213HB, England (*postcode does not exist*)

DOB: 24/10/1964 (matches yours)

Height: 5'9

Hair: Sandy (*incorrect — you have never had sandy hair*)

Key Issues (Irish Law Perspective)

1. Invalid Address

No such address or postcode exists.

Under the Criminal Justice (Evidence) Act 1992, s.21, custody records must contain verifiable identifiers. This record fails outright.

2. Physical Descriptor Inaccuracy

Irish custody protocols under the Criminal Justice Act 1984, s.4 require accurate physical details.

The incorrect descriptor undermines reliability and suggests possible misidentification or deliberate data manipulation.

3. Signature Issue – Refusal to Sign

Custody records normally include the detainees confirmation signature unless they refuse.

If the record shows “refused to sign,” this conflicts directly with the existence of the second custody document bearing a signature resembling your old Hebrew-style signature (see below).

This inconsistency undermines the credibility of both records and raises a forgery or procedural malpractice concern.

31.B. Custody Record 2

Name: Peter Dunne

DOB: 7/5/61 (*wrong — your DOB is 24/10/1964*)

Date/Time: 2/7/01, 1:33am

Handwritten note indicating release from custody.

Appears to bear a Hebrew signature, similar to one I had written in the past.

Document is simply a loose notepad page:

No station header

No custody form ID

No Garda or officer signature

No case or incident reference

It appears to be part of a custody record and if so, shows intent to conceal information.

Key Issues (Irish Law Perspective)

1. Unsigned Statement vs. Signed Release Document

You've stated that your statement of the accused from the relevant period was never signed.

Yet this custody note contains a signature resembling your old style.

If Gardaí recorded "refused to sign" in one context but produced a "signed" release, this is inconsistent and procedurally suspicious.

2. Lack of Standard Garda Form

The absence of station identifiers, custody numbers, or officer signatures violates standard custody documentation practice under Garda Síochána Custody Regulations 1987.

Without these markers, the record lacks provenance and is inadmissible under Criminal Justice Act 1984, s.7.

3. DOB Discrepancy

The incorrect DOB (7/5/61) disconnects this custody note from your actual identity. If relied upon, it introduces identity confusion, violating fair procedure under Irish Constitution Art. 39.

31.C. Non-disclosure to UK Courts (2003 & 2008/09 Extradition)

Neither of these custody records was disclosed to the UK courts during your extradition hearings, despite being material evidence. This omission creates multiple procedural violations:

1. PACE 1984

Code C: Custody records are mandatory evidence in extradition-linked offences.

Code B: Any inaccurate identifiers (DOB, address, physical descriptors) must be highlighted to the defence and court.

Failure to disclose breaches PACE ss.27–28 and undermines evidential integrity.

2. Criminal Procedure and Investigations Act 1996 (CPIA)

Material undermining prosecution credibility must be disclosed to the defence.

Withholding these flawed records obstructed your ability to contest alleged Irish convictions and extradition grounds.

3. Rule of Speciality Compromised

Under the Extradition Act 1965 (Ireland) and Extradition Act 2003 (UK), extradition must only concern the specific offences charged.

Withholding custody documents while referencing them in later police reports (PNCID, Interpol notices) breaches speciality protections and contaminates subsequent proceedings.

31.D. Violations Engaged

Violation	Legal Basis	
Use of invalid address & descriptors	Criminal Justice Act 1984 (Ireland), PACE Code C	Raises doubts
Contradiction: refusal to sign vs signed release	Garda Custody Regulations 1987, PACE Code C	Suggests fabrication misconduct
Use of wrong DOB	Irish Constitution Art. 38, PACE disclosure duties	Undermines fairness
Non-disclosure to UK courts	CPIA 1996, PACE Code B, Extradition Act 2003	Breach of due process
Speciality breach	Extradition Act 1965 & 2003	Compromises extradition purpose
Potential perjury & malfeasance	Common law perjury, Misfeasance in Public Office	Officials misusing power

31.E. Summary

The custody documents are facially unreliable under both Irish and UK law.

The refusal-to-sign entry conflicts with the existence of a signed release, suggesting possible document tampering or retroactive fabrication.

The non-disclosure of these documents during UK extradition proceedings breached PACE, CPIA, and rule of speciality obligations.

If relied upon in later proceedings (Interpol notices, PNCID, family court), this constitutes procedural abuse and potential perjury.

ANALYSIS OF WARRANTS

32. 2003 IRISH WARRANT – FULL LEGAL ANALYSIS
(2003, IE & UK LAW)

attachmentsA.pdf

32.1. Identity of Defendant

The 2003 Irish warrant names “Peter Dunne” but omits any date of birth.

The warrant lists two former addresses:

Moyne Lower, Enniscorthy, Co. Wexford, Ireland

3 Charlotte Street, Rugby CP2134B, UK

My certified identity is Peter Ivan Dunne, DOB 24 October 1964, originally of Summerhill, Enniscorthy, Co. Wexford, established by:

Irish Birth Certificate

Irish Passport

UK Driving Licence

My identity was uncontested and accepted in UK Family Law proceedings and Irish court filings.

Fatal defects in the warrant's identification:

Failure to include my full legal name, date of birth, and origin address invalidates the warrant under both Irish and UK extradition standards.

The warrant fails to identify the second accused, despite the alleged offence involving two individuals, undermining procedural safeguards.

Authorities:

People (DPP) v O'Shea [1982] IR 384 (IE): warrants must "strictly and unequivocally identify the individual."

Re Ismail [1999] 1 AC 320 (UK): an extradition warrant must "contain sufficient particulars to identify the person sought."

Address defects:

"3 Charlotte Street, Rugby CP2134B" is invalid; the postcode does not exist, meaning UK authorities cannot verify identity.

32.2. Identity of Victim and Non-Disclosures

The summary of evidence alleges two men had sex with a ten-year-old mentally impaired girl against her will.

Critical legal defects:

1. No Victim Identity:

No name, DOB, or verified identity is provided for the alleged victim.

2. Contradictory Statutory Basis:

Section 5(1), Sexual Offences Act 1993, applies only to adults with mental impairment.

It does not cover rape of minors.

3. Inconsistent Allegations:

Allegation of a 10-year-old conflicts with the statute; minors should be charged under the Criminal Law Amendment Act 1936.

Authorities:

DPP v McDonagh [2001] IECCA 71: Section 5(1) requires proof of incapacity, not mere non-consent.

Re Ismail [1999] 1 AC 320: inconsistencies in victim identity or charge basis vitiate extradition.

32.2(a) Non-Disclosure of Second Accused

The 2003 summary of evidence refers to two defendants, yet:

No disclosure of the second accused's identity was made to UK extradition courts.

This omission misled UK authorities into believing the 2003 proceedings related only to me.

Consequences:

Prejudiced my ability to:

Understand the full case.

Cross-examine on joint statements.

Test evidence for severance relevance.

32.2(b) Non-Disclosure of Alleged Babies

2002 Alleged Birth: No disclosure of conception date, medical evidence, or birth certificate.

2003 Alleged Birth (2008 EAW): No reference in the 2003 warrant; contradictory timelines undermine factual basis.

Legal Consequences:

Violates Article 6(1) & 6(3)(b)-(d) ECHR → right to disclosure of material evidence.

Irish adoption of *Brady v Maryland* principles: prosecution must disclose evidence impacting identity, guilt, or defence.

DPP v Special Criminal Court ex parte Cahill [1983] IR 448: disclosure obligations are absolute where liberty is at stake.

32.3. Address Validity

Listed Irish address ("Moyne Lower") was not my residence at the alleged time.

My presence in Ireland in 2003 occurred only due to unlawful extradition, breaching the Rule of Speciality.

Authorities:

State (McDonagh) v Frawley [1978] IR 131 (IE): unlawful detention cannot create jurisdiction.

R v Horseferry Road Magistrates, ex parte Bennett [1994] 1 AC 42 (UK): unlawful extradition renders proceedings an abuse of process.

32.4. Location of the Crime

Warrant alleges: “The Quay, Thomastown, Kilkenny.”

“The Quay” encompasses multiple private and commercial locations; warrants must precisely identify crime locations.

Authorities:

Attorney General v Dyer [1947] IR 312: warrants must provide sufficient particularity.

Re Ismail [1999] 1 AC 320: extradition warrants must provide “clear particulars.”

32.5. Description of the Crime

Warrant alleges: “On 1 July 2001 had sex with a mentally impaired person contrary to Section 5(1) Sexual Offences Act 1993.”

Contradictions: victim alleged to be 10 years old, which is not covered under Section 5(1).

Authorities:

DPP v Lillis [2010] IECCA 189: incorrect statutory basis vitiates prosecution.

UK dual criminality requirement fails under:

Backing of Warrants (Republic of Ireland) Act 1965

Extradition Act 2003

32.6. DNA Orders – Exculpatory Evidence

Three Irish High Court DNA retention orders (2001–2003) list: “Peter Dunne, originally of Moyne Lower, Enniscorthy.”

No date of birth; do not match certified identity: Peter Ivan Dunne, Summerhill.

Orders were never served or disclosed to UK extradition courts.

Article 6 ECHR Violations:

Right to disclosure

Right to fair trial

Right to appeal

32.7. Fatal Consequences

Because of these defects:

Warrant fails identity standards

Relies on incorrect statute

False victim narrative undermines dual criminality

Exculpatory DNA orders were withheld

Non-disclosure of:

Second accused

Alleged babies (2002 and 2003)

32.8. Legal Void – Irish Warrant

- The 2003 Irish warrant is legally void.
- All extradition steps, linked UK and Irish orders, and subsequent proceedings derived from it are fatally vitiated under Irish and UK law (2003).

32.9. Immutability upon Entry into English Court

The moment the 2003 Irish warrant was entered into evidence before an English court:

1. Slip Rule Limitation: English courts cannot apply slip-rule corrections to Irish legal documents. Clerical or typographical corrections apply only to the issuing court's own records. Material defects, including the non-existent UK postcode and missing DOB, cannot be corrected post-entry.
2. Material Defects Locked: These defects were legally locked upon admission; they became fixed as a matter of law.
3. Legal Consequence – Void ab initio: Any subsequent process—including arrest, extradition, or sentencing—relying on this warrant is legally void ab initio.

Authorities:

- *R v Secretary of State for the Home Department, ex parte Khawaja* [1983] 1 AC 74 – English courts cannot amend foreign legal documents; material defects are fixed upon submission.
- Statute Law (Restatement) Act 2002 (Ireland) – certified Irish documents constitute legal proof; material inaccuracies cannot be corrected outside the issuing jurisdiction.

Conclusion:

From the moment of entry into English court evidence, the 2003 Irish warrant became **locked** with its original material defects. All subsequent reliance on it is legally invalid.

33. 2003 UK Warrant & Summary of Evidence – Nuneaton Magistrate's Court

attachmentsA.pdf

33.1. Identity of Defendant

The UK warrant was issued by Nuneaton Magistrates' Court under the Backing of Warrants (Republic of Ireland) Act 1966.

The warrant records the name "Peter Dunne" but:

No date of birth provided.

No place of birth provided.

No current address provided.

No second defendant identified.

Legal consequences:

The failure to specify DOB or origin renders the warrant facially invalid:

Re Ismail [1999] 1 AC 320 [UK] – House of Lords held that extradition warrants must contain "sufficient particulars to identify the person sought."

Re Arkins [1966] IR 163 [IE] – Irish Supreme Court required strict compliance with identification particulars for warrants backed under the 1965 Act.

The warrant relies on the Irish warrant for identity particulars, but that Irish warrant itself lacked a DOB and relied on 3 Charlotte Street, Rugby CP2134B – an address that:

Is non-existent.

Contains an invalid postcode ("CP2134B" is not a UK postcode format).

Cannot be verified under the Backing of Warrants framework.

33.2. Offence Description

The UK warrant fails to detail the offence – it does not state:

The section of law allegedly breached.

The identity of the alleged victim.

The circumstances or location of the alleged act.

It simply records that an Irish warrant has been received and “backed” under the 1965 Act.

Legal implications:

Under the Backing of Warrants (Republic of Ireland) Act 1965, the UK magistrates must “endorse” the warrant but cannot cure fatal defects in the Irish warrant.

The 1965 Act (Section 2) requires that:

The warrant “contain sufficient particulars of the offence.”

Those particulars must be “on the face of the warrant” – not dependent on implied or extraneous evidence.

R (Gill) v Governor of Belmarsh Prison [2006] EWHC 375 (Admin) [UK] – UK courts held that “extradition warrants must contain the particulars of the alleged offence; omissions cannot be cured post-endorsement.”

33.3. Victim Identification

The warrant includes no name or identifying detail of the alleged victim.

This omission violates the requirement of “particularity”:

Re Ismail [1999] 1 AC 320 – warrants must “specify the conduct alleged” and the parties involved.

The UK summary of evidence alleges a 10-year-old mentally impaired girl was assaulted “against her will,” but none of this detail is included on the Irish or UK warrant.

33.4. Address Validity

The UK warrant provides no UK address for me.

The only address relied upon is imported from the Irish warrant (3 Charlotte Street, Rugby CP2134B) which is invalid and non-existent.

Legal effect:

A UK court cannot execute a backed warrant if the identifying particulars are defective:

R v Governor of Brixton Prison ex parte Levin [1997] 1 WLR 741 [UK] – identification defects are jurisdictional; the warrant cannot be executed.

My true identity (Peter Ivan Dunne, DOB 24/10/1964, originally of Summerhill, Enniscorthy) was never set out.

33.5. Location of the Crime

The UK warrant does not specify any crime location – it relies entirely on the Irish warrant’s defective reference to “The Quay, Thomastown, Kilkenny.”

As established:

Attorney General v Dyer [1947] IR 312 [IE] – warrants must give sufficient detail of where the alleged offence occurred.

Re Ismail [1999] 1 AC 320 [UK] – particulars of location are a core requirement for extradition.

“The Quay” is a cluster of distinct legal properties; failure to identify a specific property means the UK warrant lacks territorial precision.

33.6. DNA Orders – Suppressed Exculpatory Evidence

Three Irish DNA retention orders (2001–2003) list “Peter Dunne, originally of Moyne Lower, Enniscorthy, Co. Wexford.”

No DOB is listed.

They were ordered by the Irish High Court to be served with leave to appeal on notice – yet:

None were served on me.

None were disclosed to the Nuneaton Magistrates’ Court in 2003.

33.7. Legal consequences:

The warrants were backed in the UK while exculpatory DNA evidence was suppressed.

This is a triple violation of Article 6 ECHR (right to disclosure, right to appeal, right to fair trial).

It also violates PACE 1984 [UK] – suppression of material evidence is unlawful.

Brady v Maryland 373 U.S. 83 (1963) [persuasive] – suppression of exculpatory evidence vitiates prosecution.

DPP v Special Criminal Court ex parte Martin Cahill [1983] IR 448 [IE] – non-disclosure breaches fair trial guarantees.

33.8. Rule of Speciality

The UK’s endorsement of the Irish warrant engages the Rule of Speciality (1957 European Convention on Extradition and incorporated principles under the 1965 Act).

By failing to specify the correct charge (Section 5(1) Sexual Offences Act 1993 alleged, but Irish summary alleging rape of a 10-year-old), the warrant breaches speciality.

R (Birmingham) v Director of the SFO [2007] QB 727 [UK] – speciality is “a substantive safeguard, breach of which vitiates extradition.”

33.9. Fundamental Flaws

No DOB – identity not fixed.

No victim named – particulars missing.

No offence details – fails dual criminality test.

No valid address – cannot identify subject.

Suppressed DNA evidence – concealed from UK court.

Speciality violation – charges inconsistent.

33.10. Conclusion – 2003 Nuneaton Magistrates Warrant

The 2003 UK warrant, issued by Nuneaton Magistrates, is jurisdictionally void:

It relied on a defective Irish warrant.

It omitted essential identifying details (DOB, address, victim, offence particulars).

It was issued in breach of the Backing of Warrants Act 1965 requirements.

It relied on suppressed exculpatory DNA evidence, violating Article 6 ECHR, PACE, and Irish disclosure rules.

33.11. Result:

This warrant cannot legally support extradition or any subsequent legal process. Every order and judgement built upon it is vitiated from inception.

34. Fundamental Defects in Charging Instruments and Breach of Speciality

attachmentsB.pdf

34.1. Statutory Requirements

Under **Order 17 of the Practice Direction under the District Court Rules (Procedure on Arrest, S.I. No. 194/2001)** and the governing law in 2003, a **Charge Sheet** and a **Statement of Offence** must set out, at minimum:

The accused's full legal name (including middle name if known)

Date of birth

Address (or sufficient particulars to accurately identify)

A description of the alleged offence in clear terms

The time, date, and place of the alleged offence

The full identification of all co-accused in the case, if more than one is charged

These requirements flow from the constitutional guarantee of a fair trial (**Article 39.1, Constitution of Ireland**) and the right under **Article 6(3)(a) ECHR** to be informed “promptly, in detail, and in a language which he understands, of the nature and cause of the accusation against him.”

Failure to include all accused undermines the **right to be fully informed of the charges** and can render extradition or trial documents defective.

34.2. Defects in the Charge Sheet

The Charge Sheet (Exhibit A) fails to:

- Include the middle name of the accused, despite this being known to the prosecuting authorities

- Provide a valid address; “The Quay” is a geographic area, not a specific address capable of uniquely identifying a person

- Identify the second accused, even though the alleged offence involved two individuals

- Ensure consistency with extradition warrant particulars

These defects violate **Order 17, S.I. No. 194/2001**, rendering the document defective and incapable of properly notifying the accused, and **compromise the procedural safeguards for all accused in the case.**

34.3. Defects in the Statement of Offence

The Statement of Offence (Exhibit B) fails to:

- Include any date of birth

- Include the accused’s middle name

- Provide an address or other sufficient identifier

- Name the second accused where the offence involves two individuals

This omission materially increases the risk of misidentification, in direct contravention of **procedural safeguards under Irish law** and the **ECHR**, and **violates the principle that all co-accused must be properly informed of the charges against them.**

34.4. Breach of the Speciality Rule

The principle of speciality governs extradition and ensures that a person surrendered may only be prosecuted for the offence(s) described in the extradition request. This principle is incorporated into Irish and UK law as follows:

2003 Extradition: Governed by the Extradition Act 1965 (Ireland), as supplemented by the Backing of Warrants Act (UK). Article 39 of the Extradition Act 1965 provides that proceedings for any offence not specified in the extradition request are ultra vires and void.

2008 Extradition: Governed additionally by the European Arrest Warrant Act 2003 (Ireland/UK) and the Framework Decision 2002/584/JHA (EU), which incorporates the speciality principle (Article 27). This act is supplementary to the 1965 Act, not a replacement, as the 2003 extradition's effect persists from the moment of arrest.

Violation of the Speciality Principle

1. The extradition request described an offence involving a 10-year-old mentally impaired girl, with an allegation of sexual activity "against her will."
2. The Charge Sheet and Statement of Offence subsequently presented in both jurisdictions:
 - Do not match the description in the extradition request.
 - Are framed in terms materially inconsistent with the warrant.
 - Omit key factual elements specified in the original extradition request.
3. By proceeding on charges materially different from those for which extradition was granted, the authorities acted ultra vires, rendering such proceedings null and void.

Supporting Evidence Confirming Factual Falsity and Speciality Breach

Ambrose Dunne (Brother) and Johanna Dunne (Mother), Signed Statements: Both confirm that no 10-year-old victim existed, directly contradicting the extradition request and proving that the extradition was executed on entirely false grounds.

Michael Buggy, Solicitor, Letter dated 20 November 2003: The letter cites a rape charge that does not exist in the official proceedings, demonstrating that the Petitioner was never properly informed of the reason for his arrest, in violation of **Article 5 HRA 1998** and **ECHR 2003**. The letter also documents that the Petitioner was denied Kosher food contrary to a court order, evidencing further procedural and rights violations during detention.

T. Lyons, Solicitor, Letter dated 4 April 2007: Explicitly states that no 10-year-old existed, confirming both a breach of the speciality principle and that the Petitioner's own counsel was aware that he was being prosecuted in violation of speciality.

T. Lyons, Solicitor, Letter dated 15 May 2007: Confirms that a trial collapsed because the word "sexual assault" appeared on a booklet of photographs, despite there being no sexual assault charge. Rape is a form of sexual assault, and its appearance in proceedings where no such charge exists further demonstrates that prosecution violated the speciality principle.

Legal Implications

Irish law: Extradition Act 1965, Article 39 – any prosecution outside the scope of the extradition request is prohibited.

UK law: Backing of Warrants Act 2003 – mirrors the speciality principle for warrants issued to and executed by UK authorities.

EU law: EAW Act 2003 (Ireland/UK) and Framework Decision 2002/584/JHA, Article 27 – establishes speciality in the context of European Arrest Warrants.

Article 5 HRA 1998 / ECHR 2003: Failure to inform the Petitioner of the true reason for his arrest constitutes a breach of the right to liberty and security.

Conclusion

The evidence from Ambrose and Johanna Dunne, Michael Buggy, and T. Lyons collectively demonstrates that the 2003 extradition was executed on false and misleading grounds. This confirms a clear breach of the speciality principle under Irish, UK, and EU law, and establishes that the Petitioner was denied fundamental procedural rights, including proper notification of charges and accommodation for religious dietary requirements.

34.5. DNA Retention Orders and Misidentification

attachmentsA.pdf

DNA retention orders in this matter record a different place of birth for the defendant than that stated in extradition and court documents.

This discrepancy raises a serious question of misidentification and compounds the failure to include full and accurate identifying particulars in the charging documents.

The State was on notice of these discrepancies yet proceeded without correcting the record — a further breach of fair procedures.

34.6. Legal Consequence

The combination of:

1. Failure to comply with Order 17, S.I. No. 194/2001;
2. Breach of Article 6(3)(a) ECHR;
3. Violation of speciality under the European Arrest Warrant Act 2003; and
4. Material misidentification risk arising from DNA order discrepancies,

...renders both the Charge Sheet and Statement of Offence legally defective and void. They cannot ground a lawful prosecution.

35.2007 IRISH BENCH WARRANT – IRISH LAW

ANALYSIS

attachmentsB.pdf

35.1. Identity of Defendant

Name only: "Peter Dunne."

Missing: Date of birth, place of birth, address.

Effect under Irish law:

Under s. 33 Criminal Justice Act 1967 (IE), a bench warrant must identify the accused with sufficient particulars to avoid wrongful arrest.

The State (McKeown) v Frawley [1978] IR 131 [IE] held that failure to provide basic identifying particulars renders a bench warrant void on its face.

35.2. Judicial Signature

Signed by a clerk of the court and a Garda superintendent.

No judge signed the warrant.

Effect:

A bench warrant must be issued by a judge or peace commissioner under Criminal Justice Act 1967 (IE), s. 33.

Byrne v Grey [1988] IR 31 [IE] confirmed a clerk cannot issue a valid warrant; without judicial signature, it has no legal force.

35.3. Offence Description

The warrant names no offence.

No statute is cited.

No facts are set out.

Effect:

Under Extradition Act 1965 (IE) s. 26 and domestic bench warrant practice, a warrant must state the offence and sufficient particulars.

Attorney General v Dyer [1947] IR 312 [IE]: absence of offence particulars = jurisdictional defect.

35.4. Victim Details

The warrant does not name a victim, nor provide age or identity.

Earlier claims (2003 summary) mentioned a “10-year-old mentally impaired girl,” but this warrant omits all victim detail.

Effect:

Re Arkins [1966] IR 163 [IE]: warrants must specify the alleged victim where identity is material to the charge.

No victim = fatally incomplete warrant.

35.5. Location of Offence

No location provided.

Effect:

Attorney General v Dyer [1947] IR 312 [IE] makes clear that jurisdiction requires a stated place of offence.

Without it, the warrant cannot be validly executed.

35.6. DNA Retention Orders – Suppressed Exculpatory Evidence

Three High Court DNA retention orders (2001–2003) identify “Peter Dunne of Moyne Lower, Enniscorthy, Co. Wexford.”

No date of birth given.

Court ordered the DNA orders be served with leave to appeal on notice.

None were served.

Impact on the 2007 warrant:

The Gardaí knew by 2007 that DNA orders existed naming a different origin address.

They withheld this from the bench warrant and from the courts.

Legal consequence:

Suppression of exculpatory evidence breaches Article 39.1 Constitution of Ireland (fair trial rights).

In DPP v Special Criminal Court ex parte Martin Cahill [1983] IR 448 [IE], the Irish courts held withholding exculpatory material is a breach of due process and undermines the validity of proceedings.

Because the first DNA order was unserved, the second was vitiated; because the second was unserved, the third was doubly vitiated. This sequence taints the entire prosecution.

35.7. Procedural Defects

No judge's signature.

No DOB, no address, no offence, no victim, no location.

Failure to disclose DNA orders and to incorporate or reconcile them with the warrant.

Irish law position:

A bench warrant missing these elements is void from inception.

The State (McKeown) v Frawley [1978] IR 131 [IE] confirms that such defects cannot be retrospectively cured.

35.8. Conclusion

The 19 October 2007 bench warrant:

Is not an extradition warrant – it is purely domestic.

Fails every legal requirement for a valid Irish bench warrant:

Missing judicial signature.

Missing offence description.

Missing victim, location, DOB, and address.

It was issued while exculpatory DNA retention orders were deliberately suppressed, compounding the procedural illegality.

35.9. Result:

This bench warrant was never legally enforceable under Irish law. It cannot lawfully underpin arrest, detention, or subsequent extradition proceedings.

36. Legal Analysis of the 30 July 2008 European Arrest Warrant (EAW) & UK Rulings

attachmentsB.pdf

The 2008 European Arrest Warrant (EAW), signed by Judge Michael Peart of the High Court, Dublin, on 30 July 2008, contains multiple material legal and factual defects rendering it invalid and unenforceable.

36.1. Introduction of Patrick McCarthy as Co-Accused and Trial Context

- The 2008 EAW introduces Patrick McCarthy as a co-accused, a person not named in the original 2003 Irish warrant and not party to the 2007 trial

(Extradition Act 1965 (Ireland); Re McCabe [1971] IR 208; Cando Armas [2005] UKHL 67).

- No evidence involving Patrick McCarthy was presented or admitted during the 2007 trial (*Extradition Act 2003, ss.17 & 146; EU Framework Decision 2002/584/JHA, Art.27*).
- This constitutes a direct violation of the Rule of Speciality, which restricts extradition and subsequent prosecution to the original charges and individuals named in the warrant (*Backing of Warrants (Republic of Ireland) Act 1965; Shannon v Fanning [1984] IR 569*).

36.2. Specificity and Contradictions Regarding Location and Charges

- The alleged offence is claimed to have occurred at “The Quay, Thomastown, Kilkenny,” a location comprising multiple distinct legally separate properties, undermining the clarity and specificity required for lawful warrants (*Extradition Act 2003, s.2(4); Cando Armas [2005] UKHL 67; Dabas [2007] UKHL 6*).
- The 2008 EAW asserts I left the jurisdiction in a foreign-registered Jeep.
- The temporal claims within the warrant are flagrantly contradictory and legally impossible:
 - The alleged offence date is 1 July 2001.
 - The warrant claims a baby was born in 2003, purportedly the product of that offence.
 - The same warrant alleges in 2008 that I admitted sexual relations with the alleged victim, linked to a child born five years earlier, creating a temporal inversion that mocks judicial integrity.
- This disregard for biological and chronological coherence fundamentally undermines the credibility and legality of the warrant (*Extradition Act 2003, ss.2(4), 21; Lapinski [2008] EWHC 2304; R v Governor of Pentonville Prison, ex p. Osagie [1990] 1 WLR 1400*).

36.3. Judicial Perjury by Judge Michael Peart

- By signing the 2008 EAW with these knowingly false or unverified claims, Judge Michael Peart committed judicial perjury (*Perjury Act 1911 (UK); R v Bow Street Magistrates Court, ex parte Pinochet Ugarte (No.3) [2000] 1 AC 119*).
- Under Article 41.3.1 of the Irish Constitution, judicial officers are bound to uphold truth and justice.
- Jurisprudence confirms judicial immunity does not shield criminal misconduct (*Pinochet No.2 [1999] 1 AC 119; Pinochet No.3 [2000] 1 AC 119*).

36.4. Breach of Extradition Law and Rule of Speciality

- The introduction of a co-accused absent from the original warrant and trial violates the Extradition Act 1965 (Ireland), the European Arrest Warrant Act 2003 (Ireland), and equivalent UK statutes

(Extradition Act 2003, ss.2,17,146; EU Framework Decision 2002/584/JHA, Art.27).

- It breaches the Backing of Warrants (Republic of Ireland) Act 1965, which governed bilateral warrant enforcement between Ireland and the UK pre-2004

(Re McCabe [1971] IR 208; Shannon v Fanning [1984] IR 569).

- These breaches void any lawful basis for extradition predicated on this warrant
(Cando Armas [2005] UKHL 67; Dabas [2007] UKHL 6).

36.5. Failure of Evidence Disclosure and Fair Trial Violations

- Key DNA retention orders and other exculpatory evidence were never served or disclosed to the UK courts

(Police and Criminal Evidence Act 1984; Article 6 ECHR).

- The suppression of such evidence constitutes denial of due process, breaching constitutional and human rights obligations in both jurisdictions

(Piersack v Belgium (1982) 5 EHRR 169; Hauschildt v Denmark (1989) 12 EHRR 266).

36.6. Westminster Custody Suite Violations of Human Rights

- While in custody at Westminster Magistrates' Court, I was served food that was not kosher and contained onion, to which I have a severe allergy

(Articles 2, 3, 8, 9 ECHR; Human Rights Act 1998, ss.6–7).

- I personally presented this food package to the court, directly informing it of violations of Convention rights.

- By failing to act, the court became complicit in the breach

(Piersack v Belgium; Hauschildt v Denmark).

36.7. Court Awareness of Speciality Violation

- The court was explicitly informed that the 2003 extradition was for an entirely different matter: a supposed "10-year-old victim" who did not exist.

- The 2008 EAW itself proves the violation of speciality, showing the alleged victim was 20 years old at the time of the supposed offence

(Extradition Act 2003, ss.17,146; Re McCabe [1971] IR 208; Cando Armas [2005] UKHL 67; Dabas [2007] UKHL 6).

- By proceeding despite this, Westminster acted contrary to binding UK, Irish, and EU law
(EU Framework Decision 2002/584/JHA, Art.27).

36.8. Loss of Impartiality and Ultra Vires Action

- By failing to prevent rights violations in custody and knowingly ignoring a speciality bar, Westminster Magistrates' Court forfeited impartiality and jurisdiction

(Pinochet No.2 [1999] 1 AC 119).

- Orders made under such circumstances are ultra vires and void ab initio
(R v Bow Street Magistrates Court, ex parte Pinochet Ugarte (No.3) [2000] 1 AC 119).

36.9. Integrated Effect of Irish and UK Defects

- The defects in the 2008 EAW (Ireland) and the failures of Westminster Magistrates' Court (UK) are inextricably linked.

- The Irish warrant was void on its face; the UK court compounded this by breaching human rights and ignoring speciality

(Re McCabe [1971] IR 208; Extradition Act 1965; Extradition Act 2003, ss.2,17,146; Piersack v Belgium; Hauschildt v Denmark).

- The result is a double nullity – no valid warrant and no valid judicial process.

36.10. Conclusion: Jurisdictional Nullity of the Westminster Orders

- The 2008 EAW was defective, contradictory, and unlawful.
- Westminster Magistrates' Court, bound by the Human Rights Act 1998 and aware of the speciality breach, nevertheless proceeded.

- In doing so it violated Articles 2, 3, 6, 8, and 9 ECHR, and acted contrary to the Extradition Act 2003, Backing of Warrants (Republic of Ireland) Act 1965, and binding EU law.

- By established jurisprudence, any orders made in reliance upon such a warrant and in such circumstances are null and void from inception, having been issued without jurisdiction

(Lapinski [2008] EWHC 2304; R v Governor of Pentonville Prison, ex p. Osagie [1990] 1 WLR 1400; Cando Armas [2005] UKHL 67; Dabas [2007] UKHL 6).

37. 2009 Limerick Sentence Warrant and Denial of Kosher Food

attachmentsG.pdf

I bring before the Court the Limerick Prison sentence warrant relating to Trial KK24/03, listing the name Peter Dunne, but containing no middle name, no address, and citing only Section 5 of the Criminal Law (Sexual Offences) Act 1993. The warrant directs a 5-year custodial sentence and specifies the Court of Conviction.

The warrant also includes a recommendation that the accused be provided kosher food throughout imprisonment, which was never complied with. During the 2008 extradition, kosher provision was explicitly raised and incorporated into the surrender terms, while under English law such accommodation is also implicitly required to satisfy humane detention and religious rights obligations.

37.1. Identification Deficiencies and DOB Discrepancy

Irish law requires that a warrant unequivocally identify the accused (*People (DPP) v O'Shea [1982] IR 384*).

The warrant contains a discrepancy in the accused DOB: the conviction certificate lists 24/10/1964, while the conviction and sentence certificate lists 20/10/1965.

This discrepancy, combined with missing middle name and address, renders the warrant legally ambiguous and prevents unambiguous identification of the accused.

Execution under these conditions constitutes unlawful detention and violates Article 6 ECHR, as the accused cannot effectively verify or challenge the warrant.

37.2. Insufficient Particulars of Offence

The warrant lists only Section 5 of the Criminal Law (Sexual Offences) Act 1993, without specifying the victim, date, location, or circumstances.

Lack of particulars prevents proper verification and denies the accused meaningful opportunity to challenge detention, constituting a continuing breach of Article 6 ECHR (*DPP v Kelly [1988] IR 587; Re Haughey [1971] IR 217*).

37.3. Denial of Kosher Food – Religious Rights Violation

Despite explicit mention in the warrant and the 2008 extradition surrender, prison authorities failed to provide any kosher food.

This constitutes ongoing violations of Articles 8 and 9 ECHR, as incorporated by the European Convention on Human Rights Act 2003, Section 2.

Failure to provide religious accommodation, especially where explicitly required, demonstrates systemic disregard for the accused's rights (*C v Ireland [2012] ECHR 2012/116*).

37.4. Speciality Rule and Cross-Border Implications

The rule of speciality, codified in Article 39 of the Extradition Act 1965 (Ireland), requires that a person surrendered under extradition may only be proceeded against for the offence described in the warrant.

Deficient identification, DOB discrepancies, and failure to comply with explicit extradition terms violate the principle of speciality, particularly in cross-border enforcement.

Any reliance on this warrant for extradition or recognition abroad is void ab initio (*State (McDonagh) v Frawley [1978] IR 131*).

37.5. Consequences of Defects

1. Procedural Invalidity: Warrant cannot lawfully be executed due to missing identifiers and DOB inconsistency.
2. Misidentification Risk: Another individual with the same name could be wrongfully detained.
3. Religious Rights Breach: Denial of kosher food, despite explicit surrender terms and implicit English law obligations, violates Articles 8 and 9 ECHR.
4. Continuing Article 6 Violation: Ambiguity prevents verification and lawful challenge of detention.
5. Cross-Border Enforcement Risk: Reliance on this warrant for extradition would violate speciality and international obligations.

37.6. Authorities and References

Irish Law:

People (DPP) v O'Shea [1982] IR 384

DPP v Kelly [1988] IR 587

Re Haughey [1971] IR 217

State (McDonagh) v Frawley [1978] IR 131

Criminal Law (Sexual Offences) Act 1993, Section 5

Extradition Act 1965 (Ireland), Article 39 – Specialty Rule

European Law:

Articles 6, 8, 9 ECHR

European Convention on Human Rights Act 2003, Section 2

ANALYSIS OF Judgement Certificates

Adverse findings were made in absence of due process and under materially false 2007 & 2009

CERTIFICATES OF CONVICTION AND SENTENCE — IRISH CIRCUIT COURT

These analysis do not restate the surrounding violations, only the failings on the face of the documents, with the due process violations and suppression of evidence, the failings are much worse.

This analysis is done to show that each warrant is invalid on its Face.

38. 2007 Certificate of Conviction (19 October 2007)

attachmentsC.pdf

Origin: Irish Circuit Court

Content: Lists “Peter Dunne,” DOB 24 October 1965. Cites conviction under Section 5(1) of the Criminal Law (Sexual Offences) Act 1993 (Ireland), allegedly committed on 1 July 2001.

Defects and Legal Implications:

1. No valid address recorded – violates identification requirements (*People (DPP) v O’Shea* [1982] IR 384).
2. No victim particulars provided – breaches Article 6 ECHR right to a fair trial (*Re Haughey* [1971] IR 217).
3. Reliance on false factual basis – repeats the “mentally impaired victim” allegation used in 2003 and 2008 extradition warrants, materially different from the Nuneaton authorization, violating the Rule of Speciality (*Extradition Act 1965, Article 39; State (McDonagh) v Frawley* [1978] IR 131).

4. DNA retention orders – disclosed in Ireland but not in the UK. Scientific material, methodology, and process remain undisclosed, sustaining a non-disclosure argument (*People (DPP) v Special Criminal Court [1999] 1 IR 60; PACE 1984 ss.76 & 78*).
5. It is void ab initio as such, no slip-rule correction can attach, and the record is legally immutable from the moment of issuance.

39. 2007 Certificate of Conviction and Sentence (6 October 2007)

attachmentsC.pdf

Origin: Irish Circuit Court

Content: Lists “Peter Dunne,” DOB 20 October 1964, signed 6 October 2007, 11 days before trial and sentencing.

Fatal Flaws:

1. It was obtained by the applicant from the English Authorities and remains unserved in Irish law
2. Pretrial issuance renders it a nullity – issuance of a conviction-and-sentence certificate before trial constitutes conviction without trial, violating the presumption of innocence under Irish law and Article 6 ECHR (*State (Byrne) v Frawley [1978] IR 326; People (DPP) v O’Shea [1982] IR 384*).
3. Consequential vitiation of trial – the trial based on or associated with this pretrial certificate is legally compromised ab initio, as the foundational document was invalid.
4. DOB discrepancy (20 Oct vs. 24 Oct) – an exculpatory fact that materially affects identification and should have been disclosed (*PACE 1984 ss.76 & 78; People (DPP) v Special Criminal Court [1999] 1 IR 60*).
5. Invalid addresses – Pullinstown, Marshallstown; 3 Charlotte Street, Rugby CP2134B; 90 Clon Bui, Enniscorthy, reflecting vitiated extradition and custody (*State (Trimbole) v Governor of Mountjoy Prison [1985] IR 550*).
6. "It is void ab initio and contains material errors, including a pre-trial signature date and an invalid foreign address; as such, no slip-rule correction can attach, and the record is legally immutable from the moment of issuance."

40. 2009 Certificate of Conviction and Sentence (6 October 2009)

attachmentsC.pdf

Origin: Irish Circuit Court

Content: Lists “Peter Dunne,” DOB 20 October 1964, with altered signing date 6 October 2009.

Defects and Legal Implications:

1. It was altered without judicial oversight and served to me.
2. Retrospective alteration invalid – cannot cure defects in prior certificates; original and subsequent certificates remain void where pretrial or materially flawed (*Minister for Justice v Stapleton [2008] IESC 30*).
3. Circuit Court jurisdictional limits – cannot retrospectively amend High Court orders or factual defects.
4. Kosher provision absent – reflects continuing violation of Articles 8 and 9 ECHR, despite explicit surrender terms in 2008.
5. DOB discrepancy (20 Oct vs. 24 Oct) – an exculpatory fact that materially affects identification and should have been disclosed (*PACE 1984 ss.76 & 78; People (DPP) v Special Criminal Court [1999] 1 IR 60*).
6. Invalid addresses – Pullinstown, Marshallstown; 3 Charlotte Street, Rugby CP2134B; 90 Clon Bui, Enniscorthy, reflecting vitiated extradition and custody (*State (Trimbole) v Governor of Mountjoy Prison [1985] IR 550*).
7. It is void ab initio and contains material errors, including an illegally altered signature date and an invalid foreign address; as such, no slip-rule correction can attach, and the record is legally immutable from the moment of issuance.

41. Identification and DOB Discrepancies

The accused is referenced inconsistently across all Irish and UK documentation:

Pretrial certificate (Certificate B): DOB 20/10/1964, invalid and exculpatory.

Conviction & sentence certificate: DOB 20/10/1964, not my DOB.

Material effect: Pretrial certificate issued before trial constitutes conviction without trial, irreparably breaching presumption of innocence (Article 6 ECHR) and vitiating the trial.

Retrospective alterations cannot cure defects; original certificates remain void ab initio, making all derivative enforcement, extradition, and warrants legally invalid.

42. Breach of the Rule of Speciality

I was extradited from the UK under a warrant specifying one set of offences. The Irish prosecution proceeded on different factual bases and alleged offences, violating:

Article 39, Extradition Act 1965 (Ireland)

Section 11, Backing of Warrants (UK) Act 1965

European Arrest Warrant Framework Decision 2002/584/JHA, Article 27

European Arrest Warrant Act 2003 (Ireland)

Extradition Act 2003 (UK)

The State (Trimbole) v Governor of Mountjoy Prison [1985] IR 550 [IE] confirms that custody obtained unlawfully is void ab initio.

No UK consent was sought or obtained to prosecute on different facts, making the entire process legally invalid.

43. Lack of Counsel and Judicial Obstruction

At sentencing, I proceeded without legal counsel:

My solicitors had not come off record; I was not notified of their absence, and it is unknown if they were uninformed or refused to attend.

I represented myself under duress and cross-examined Sgt. Whelan to secure exculpatory testimony.

I demanded clarification on cross-charge extradition legality and my right to counsel; both were ignored.

The judge specifically ruled against appeal on the basis of exculpatory testimony, a deliberate obstruction of justice.

These actions fully vitiate the trial under the Rule of Speciality, as proceedings were manifestly outside fair and just procedure, involving a different victim and defendant than authorised.

44. Sgt. Patrick J. M. Whelan's Testimony – Identity Mismatch Established

Cross-examination established:

Custody records list the defendant DOB 07/05/1961, does not match mine.

Sandy hair; my details do not match.

Place of Origin in the DNA orders does mean place of birth, Moyne Lower, Enniscorthy, Co. Wexford, Ireland, does not match my place of birth/origin.

Alleged “10-year-old victim” referenced in materials does not exist; actual victim is 20.

Despite this, the court ignored the exculpatory testimony, acted ultra vires, and proceeded to conviction and sentencing.

45. Suppression and Non-Disclosure

The transcript of cross-examination and other exculpatory materials remain withheld from me.

Violations include:

The People (DPP) v Special Criminal Court [1999] 1 IR 60 [IE] – mandatory disclosure of exculpatory material.

Edwards v UK (2002) 35 EHRR 487 – withholding exculpatory material violates Article 6(1) ECHR.

Non-disclosure invalidated both the 2003 and 2008 extraditions, compounding violations across jurisdictions.

46. Religious Rights Breach

Sentence certificates and warrants recommended kosher provision, which was never provided.

Explicitly raised in 2008 extradition; ignored, violating Articles 8 & 9 ECHR and corresponding UK and Irish obligations.

47. Cumulative Legal Consequences

Identification and certificate defects, combined with:

Rule of speciality violations
Exculpatory testimony suppression
Lack of counsel and judicial obstruction
Religious rights breach
DNA and scientific evidence non-disclosure

Result in:

Permanent violation of Article 6 ECHR and Irish constitutional rights.
Permanent violation of Article 6 HRA 1998 rights.
Inability of domestic courts to provide effective remedy
Void ab initio effect on all warrants, convictions, extraditions, sentence and all UK rulings and judgements affected by or arising out of the Ireland matter.
A systemic pattern demonstrating gross abuse of process across UK and Irish jurisdictions, necessitating High Court intervention.

48. Conclusion

I respectfully state that:

The trial and sentencing in KK24/03 were conducted in breach of the Rule of Speciality. My identity as the accused was never established, and sworn testimony confirmed that I am not the person described in the prosecution's records.
The Court proceeded despite being on notice of these defects, acting ultra vires and rendering the conviction and sentence void ab initio.
The continuing suppression of Sgt. Whelan's testimony has compounded these breaches and perpetuated unlawful custody and proceedings.

49. DNA ORDERS AS OVERRIDING EVIDENCE

The High Court DNA retention orders show place of origin: Moyne Lower, Enniscorthy — not my true origin (Summerhill, Enniscorthy).

No date of birth is on these DNA orders, making them non-matching by identity.

These orders were:

1. Ordered to be served with leave to appeal;
2. Never served, a breach of Irish procedural law (*DPP v Special Criminal Court* [IE]; see also Criminal Justice Act 1999 disclosure obligations);

3. Withheld from UK extradition courts in 2003 and 2008, violating PACE 1984 (UK) and Irish disclosure rules.

Each failure to serve vitiates the next order (the second vitiates the third), amounting to perversion of the course of justice and contempt of court.

49.1. LEGAL EFFECT

1. Conflicting DOBs and invalid addresses

DOBs on the certificates (20 Oct vs. 24 Oct) are inconsistent; addresses are invalid because any residence forced under unlawful extradition cannot be legally attributed to me.

2. Predated conviction and sentence certificate (2007)

No trial had taken place, making it impossible for any lawful “certificate of conviction and sentence” to exist on 6 October 2007.

3. 2009 altered certificate

Not a valid correction; an unauthorised alteration cannot cure the defects of a pre-dated certificate.

4. Disclosure failures and suppression

Ireland never disclosed the 2007 “conviction and sentence” certificate to the UK. The UK authorities had a copy but the Irish State withheld it, a deliberate act of concealment showing state-sponsored attack on my person.

5. Circuit Court jurisdictional barrier

A Circuit Court cannot amend a High Court order — and none of these certificates could legally correct or override the DNA retention orders or their service failures.

6. State liability

The withholding of the DNA orders until after extradition and again in 2008 was not procedural error — it is deliberate state misconduct and evidence of malicious abuse of process.

49.2. CONCLUSION

None of these certificates have lawful standing.

The 2007 conviction-only certificate is defective; the 2007 conviction-and-sentence certificate is void (pre-dated trial); the 2009 certificate is an unlawful alteration.

Because of these flaws, Ireland cannot “fix” these documents — they are spent, uncorrectable, and contaminated by jurisdictional and procedural violations.

As these defective documents were placed before UK authorities, they fatally undermine all downstream processes (Sex Offender Registration, warrants, extradition reliance, etc.).

49.3. Result:

UK courts cannot lawfully rely on any of these documents, and Ireland is deadlocked — legally unable to retrospectively repair the record and cannot lawfully rely on any of these documents.

50. Fundamental Defects in Charging Instruments and Breach of Speciality

Grounds of Challenge:

1. Fundamental Defects

Both the Charge Sheet and Statement of Offence suffer from defective particulars:

Defendant identity insufficient: name only, no middle name or address (DOB only on charge sheet).

Location vague: “the Quay, Thomastown” encompasses multiple properties.

Time of offence unspecified: only date provided.

Victim particulars incomplete: no age, no evidence of mental impairment.

Mens rea element absent: no allegation that the accused knew or ought to have known the victim was mentally impaired.

These defects prevent the accused from knowing the case to be met, in breach of *The People (DPP) v. McGrath [1993] 1 IR 1* and *The People (DPP) v. Cooney [1996] 2 IR 1*, and violate Article 39.1 of the Constitution.

2. Breach of Speciality

The charging instruments reference the same location and allegations previously cited in extradition proceedings.

Speciality rules require that any prosecution be confined to the offences and particulars for which extradition was granted.

The UK summary of evidence explicitly states the offence occurred in the early hours of the morning, and against her will, whereas the Irish instruments list only

the date (01/07/2001) and allege sexual intercourse with a mentally impaired person.

This is a materially different statutory offence and cannot be validly prosecuted under the cited 1993 Act.

The UK evidence also refers to two men having intercourse with the victim, but the second person's identity is not given and there is no mention of a second accused on the Irish warrant.

There is no mention of the victim being 10 years old or "against her will" on the 2003 Irish warrant.

These discrepancies constitute a breach of speciality and highlight fundamental defects in the charging instruments.

51. Defects in Charge Sheet (No. 223181, Station 3570L)

attachmentsB.pdf

Grounds of Challenge: Insufficient Particulars and Failure to Identify Defendant

1. Defendant Identification Defect

Charge sheet identifies only "Peter Dunne", DOB 24/10/1964, but no address or middle name.

Insufficient to identify a defendant with certainty.

Legal basis: *McGrath [1993]*; *Cooney [1996]*.

2. Time of Offence Defect

Only the date (01/07/2001) is given; no time of day.

The UK summary of evidence specifies "early hours of the morning", directly contradicting the Irish instruments and highlighting vagueness.

This prevents proper preparation of alibi and other defences.

3. Location Defect

"The Quay, Thomastown, Co. Kilkenny" is vague; multiple properties exist.

Cannot be amended due to prior extradition citation.

4. Victim and Statutory Element Defects

Victim not named.

No age provided.

No evidence of mental impairment.

Mens rea not alleged.

Irish instruments allege sexual intercourse with a mentally impaired person, whereas UK evidence states “against her will” – materially different charge not supported by Section 5(1) 1993 Act.

Irish charge sheet makes no mention of a second accused or a 10-year-old victim, both referenced in the UK evidence.

52. Defects in Statement of Offence

attachmentsB.pdf

Grounds of Challenge: Insufficient Particulars and Incomplete Allegations

1. Defendant Identification Defect

Statement of offence refers only to “Peter Dunne”, no middle name or address.

Insufficient to identify the accused uniquely.

2. Time of Offence Defect

Only the date (01 July 2001) is stated; no time of day.

UK summary of evidence specifies “early hours of the morning”, highlighting vagueness and inability to verify evidence.

3. Location Defect

“The Quay, Thomastown, Co. Kilkenny” is not a specific property.

Cannot be amended due to prior extradition proceedings.

4. Victim and Statutory Element Defects

Victim named (Lorraine Cashin), but no age specified.

No evidence of mental impairment included.

Mens rea not specified (knowledge of impairment).

UK summary explicitly states “against her will”, which is materially different from the Irish allegation of mental impairment.

UK evidence mentions two men having intercourse, but the Irish statement only refers to one accused; second accused is absent.

No mention of the 10-year-old victim or “against her will” in the 2003 Irish document.

53. Speciality Violations

2001–2003 DNA Orders Void Ab Initio — Violation of Speciality

The DNA orders issued between 2001 and 2003 relate exclusively to a third party, not the defendant subject to prosecution. This fundamental error means the entire case is void ab initio and ultra vires, as the charges involve a different individual altogether. Under the speciality principle, legal actions must be strictly confined to the offences and persons specified in the valid warrant or extradition request. Because these orders concern a third party, all Irish legal actions stemming from them constitute a violation of speciality by proceeding beyond the authorized scope.

2003 Warrant Declared Void by the 2008 European Arrest Warrant (EAW) — Violation of Speciality

The 2008 EAW, which relies upon and references the 2003 warrant, confirms the latter's void status. Since the 2003 warrant is invalid, the EAW effectively voids itself, rendering all prosecutions, detentions, or legal actions founded upon it unlawful. This recursive invalidity breaches the speciality principle, which prohibits prosecution for offences not validly included in the extradition or surrender documentation.

Irish Circuit Court Certificates Disclosed Post-Extradition — Violation of Speciality

Certificates from the Irish Circuit Court, disclosed only after extradition and not presented to UK courts at the relevant time, reveal that key charges were invalid or spent. The failure to disclose these certificates in UK proceedings meant prosecutions continued without lawful authority. This withholding and continued reliance on invalid certificates breach the speciality principle by enabling prosecution outside the permitted scope.

Denial of Kosher Food as an Express Condition of Surrender — Violation of Speciality

The provision of kosher food was an inherent and explicit condition of surrender under the Human Rights Act 1998 (HRA), reflected in Articles 3 (prohibition of inhuman or degrading treatment) and 9 (freedom of religion) of the European Convention on Human Rights (ECHR), and codified in the 2008/2009 extradition terms. Denial of kosher food during detention breaches these rights and violates the speciality principle by failing to comply with essential surrender conditions.

Coventry Family Law Proceedings Tainted by 2003 False Claims — Violation of Speciality

The family law case in Coventry relied on false claims traceable to the invalid 2003 warrant and associated charges. Since these foundational claims stem from a void warrant, the

family court proceedings themselves violate the speciality principle by basing decisions on disallowed evidence and charges outside the lawful scope of prosecution.

Newcastle Sex Offender Register (SOR) Registration Based on Speciality-Violated Case — Violation of Speciality

The SOR registration in Newcastle is predicated on offences originating from the speciality-violated 2003 warrant. Registration under these circumstances is unlawful, perpetuating the breach of speciality and infringing on rights protected under domestic and international law.

Newcastle Family Law Case Based on 2003 Falsehoods and New False Claims — Violation of Speciality

The Newcastle family law case depends on the same invalid 2003 warrant-related falsehoods and additional fabricated statements. Proceeding on such evidence breaches the speciality principle by acting beyond the scope of authorized charges.

Interference with Legal Correspondence — Violation of Speciality via Breach of Extradition Conditions

Interference with legal correspondence—censorship, delay, or obstruction—violates the inherent conditions of extradition under HRA 1998 Articles 6 (right to fair trial) and 8 (right to private and family life). Such interference undermines legal defence rights tied to extradition and custody, breaching the speciality principle's procedural safeguards.

Prison Rape Incident in Victim Impact Statement — Violation of Speciality and Human Rights

The prison rape incident, now a settled fact in the victim impact statement, violates Articles 3 and 8 of the ECHR/HRA 1998. It breaches the duty of the state to provide humane detention conditions and protection, an essential aspect of the speciality principle and surrender terms.

10 October 2005 Attempted Murder and State Failure to Protect or Investigate — Violation of Speciality and ECHR/HRA Rights

The state's failure to protect or investigate the 10 October 2005 attempted murder by non-state actors violates Articles 2 (right to life), 3, 8, 9, 13, and 17 of the ECHR and HRA 1998. This omission breaches the speciality principle by denying effective remedies and protection integral to lawful custody and extradition.

54. Procedural and Evidential Irregularities in Reports Relating to Nathan Domek and Peter Dunne

WCC-nathan.PDF

54.1. Initial Assessment Report (21 September 2012)

Document: C Initial Assessment V4 (WCC V2)

Author: Ms Holly Nash

Subject: My son, Nathan Domek

Key Details:

Nathan's name and date of birth are correctly recorded.

Document partially redacted to protect medical privacy.

54.1.1 False Allegations Contained in the Report

Page 3 states:

Nathan's father is "currently in prison due to allegations of child sexual abuse against a 10-year-old female in Ireland."

Historically, Nathan had "also made an allegation" against his father.

Rebuttal:

The first allegation is manifestly untrue.

The second allegation has never been evidenced, criminally investigated, the applicant has never been allowed opportunity to refute this false allegation.

Disclosure Failure:

This report remained undisclosed to me until 2021/2022, undermining my ability to respond effectively.

attachmentsF.pdf

54.2. Northumbria Police Disclosure Report (15 April 2022)

Prepared for: Katie Reay, Solicitor, Legal Services, Northumberland County Council.

Produced by: Northumbria Police, Information Management Unit, Disclosure Section.

54.2.1 Personal Data Errors

The report identifies me as:

Peter Dunne, DOB 24/10/1964, without a middle name.

Later inconsistently refers to me as "Peter Dunn."

54.2.2 Interpol Green Notice Claim

References Incident 158, dated 03/07/2021:

Claims it originated from an Interpol Green Notice stating that “Peter Dunn from the Republic of Ireland has a locate-trace in place.”

Asserts that:

I was supposed to be on a sex offender register due to a “previous rape conviction.”

I allegedly fled Ireland without complying with register requirements.

Rebuttal:

No such Interpol notice has been evidenced.

No such rape conviction exists.

54.3. Police Coercion and Breach of Rights

The report states that when police attempted to engage me:

I was told that “if I did not go inside, the conversation would occur on the doorstep for all to hear.”

Legal Breach:

This constitutes a violation of:

PACE 1984, Sections 58 and 62 (right to private consultation with a solicitor).

Article 6 ECHR – right to a fair hearing and legal representation.

Impact:

This coercive threat:

Undermined my ability to obtain legal counsel.

Jeopardised my family court proceedings.

Violated the rule of speciality in cross-jurisdictional matters.

54.4. Fabricated Convictions and Allegations

54.4.1 Purported Conviction (01/07/2001)

The report falsely references a conviction for “sexual activity with a mentally impaired female adult.”

Rebuttal:

No such conviction exists.

54.4.2 Historic Enniscorthy Allegation (1984)

Report claims:

An “unlawful carnal knowledge” conviction dated 08/02/1984 in Enniscorthy.

Suggests a “modus operandi” of targeting “girls under 15 with learning difficulties.”

Rebuttal:

I have never been charged, investigated, or convicted in Enniscorthy in 1984.

The alleged “modus operandi” is entirely fabricated.

54.4.3 Thailand Allegations

Report asserts allegations relating to my supposed time “living in Thailand.”

Rebuttal:

I have never lived in Thailand.

These claims are impossible.

54.5. Consequences of False Information

54.5.1 Use in Family Court Proceedings

These fabricated claims and misrepresentations were later relied upon in family court.

Resulting Prejudice:

The court acted on false information.

This constitutes perjury by officers and malfeasance in public office.

54.5.2 Delayed Disclosure

Reports containing these claims were withheld for over a decade, denying me the opportunity to challenge them in a timely manner.

54.6. Legal Breaches and Procedural Failures

54.6.1 Violations Identified

Article 6 ECHR:

Right to a fair trial and legal representation.

PACE 1984 (Sections 58 & 62, Code C):

Denial of private solicitor access.

Improper recording of unverified allegations.

Misrepresentation:

False recording of my legal and factual status in police and social services documents.

Non-Disclosure:

Withholding of relevant reports for over 10 years.

Perjury & Malfeasance:

Use of knowingly fabricated allegations in court.

54.6.2 Cumulative Impact

These combined actions constitute:

A manifest procedural failure.

Unsafe reliance on false and fabricated information.

Material prejudice in both:

Family court proceedings.

Extradition-related matters.

55. PNCID Report (For Use of Prosecutors Only)

attachmentsF.pdf

PNCID: 06/544824Q

The report is marked “for use of prosecutors only” and explicitly states “must not be disclosed to any other party.”

The report correctly identifies my name Peter Dunne, DOB 24/10/1964, and my UK residential address. However, it records two alleged convictions, neither of which is supported by any evidence or valid court record:

55.1. First Alleged Conviction – 08/02/1984

Claims offence: Intercourse with girl under 16, contrary to the Sexual Offences Act 1956, s.6.

Claims a fine of €64.49 was imposed.

This creates a series of manifest conflicts and procedural impossibilities:

1. The Sexual Offences Act 1956 is UK legislation and has no application to Ireland. If the allegation relates to an alleged Irish offence, this cannot lawfully be recorded under UK statute.
2. No documentary evidence of any such conviction has ever been disclosed to me, either at the time or subsequently, despite numerous subject access requests and data disclosure obligations.
3. The imposition of a €64.49 fine is inconsistent with Irish sentencing norms, and Ireland did not use euros in 1984.

4. The alleged modus operandi previously cited in other reports — involving a girl under 15 with learning difficulties — is entirely fabricated and unsupported by any investigative or judicial record.

55.2. Second Alleged Conviction – 06/10/2009

Claims offence: Indecent assault on female, alleged date 01/07/2001.

Cites Sexual Offences Act 1956, s.13.

Again, this is legally and factually impossible:

1. No such conviction exists in any Irish or UK court records for 2009.
2. Applying UK legislation (Sexual Offences Act 1956) to an alleged Irish matter is procedurally improper and unlawful unless supported by a valid mutual legal assistance framework or cross-border statutory basis, which does not exist.
3. No disclosure of this alleged conviction was made during extradition proceedings (2008–2009), nor during family court proceedings, despite the material relevance.

55.3. Legal and Procedural Violations

1. Breach of Disclosure Obligations – failure to disclose material despite reliance, contrary to the Criminal Procedure and Investigations Act 1996 (CPIA).
2. Breach of Rule of Speciality – fabricated convictions inserted into UK records post-extradition, outside the scope of the extradition warrant.
3. Violation of Article 6 ECHR – reliance on false records prejudicing both criminal and family proceedings.
4. Malfeasance in Public Office & Potential Perjury – deliberate recording and presentation of false convictions.

56. ICS Report, Coventry City Council October 2008

ICC reports.PDF

1. I am the subject of ICS and social services reports dated 13 October 2008 and 28 October 2008, which were not disclosed to me during extradition proceedings in 2008–2009.
2. The ICS report dated 13 October 2008, authored by Victoria Palmer, records a referral from Beverly Ellis Jones of the Child Abuse Investigations Unit. The report contains multiple

identification errors: my name is given as “Peter Dun,” my daughter’s name is spelled incorrectly, and my wife’s name is spelled incorrectly.

3. The same report alleges that I was arrested for sexual offences concerning an 18/19-year-old who has the mental age of ten. These allegations are manifestly untrue and remained undisclosed until 2021/2022 in the Newcastle family law case.
4. The ICS report dated 28 October 2008, lead practitioner Masimba Ngulube (Yellow Team), states that this matter was referred by Ann Burley, Health CP, to the CAIU. Ann Burley received a request from Scotland Yard in September for the child’s medical records, alleging that she was at risk from her father.
5. The 28 October report identifies me as Peter Dunne or Ivan Gan, DOB 24/10/1964, and my wife as Choi Yeng Gan, DOB 15/01/1973. It also gives the names of Rachel Hogg, social care, and Hayley Fairburn, Police, CAIU.
6. The ICS report dated 28 October 2008, authored by Masimba Ngulube (Yellow Team), records alleged previous offences as follows: harassment in Birmingham (case dropped), and a historical sexual offence in Ireland in 2004 described as “Unlawful Carnal Knowledge – girl under 15 years,” claiming I was convicted. The report explicitly states that I was 20 years old at the time of the alleged 2004 offence. This is factually impossible, as my date of birth is 24/10/1964, making me 40 years old in 2004. The report further alleges that I took a girl with learning difficulties into a toilet and had intercourse with her. These allegations are entirely fabricated; the alleged 2004 case does not exist, no conviction exists, and the age of the alleged offender is demonstrably false. The report also claims that I was recently arrested on an International Arrest Warrant for sexual offences committed in Ireland in 2000, that I am awaiting sentencing, and that I am expected to receive ten years’ imprisonment. None of these claims correspond to reality. These false allegations were recorded by ICS and relied upon in social services and police documents without disclosure to me during the 2008–2009 extradition proceedings, in breach of Article 6 ECHR and the Police and Criminal Evidence Act 1984 (PACE 1984) regarding accurate recording of allegations and avoidance of misleading statements.
7. In the 28 October report, my daughter’s name is still incorrect, while other identities are correct. The report cites my first alleged offence as Birmingham, which was dropped, yet it

is presented as an offence. The historical case for 2004 involving a girl under 15 is false, and there is no year 2000 arrest or International Arrest Warrant.

8. Both ICS reports contain multiple factual inaccuracies, misidentifications, and non-existent offences, and were not disclosed to me during the 2008–2009 extradition proceedings.
9. The Social Services and Police non-disclosure, combined with the manifest inaccuracies, constitutes a procedural failure and a violation of my right to a fair hearing under Article 6 ECHR and FPR Part 21.

The C Initial Assessment V4 (WCC V2), dated 21 September 2012 and authored by Ms Holly Nash regarding my son Nathan Domek, correctly records Nathan's name and date of birth. The document is partially redacted to protect the medical privacy of my former partner and my son.

Page 3 of the report states that Nathan's father is currently in prison due to allegations of child sexual abuse against a 10-year-old female in Ireland, and that historically Nathan had also made an allegation against his father. The first allegation is manifestly untrue, and the second allegation has never been evidenced or criminally investigated. This report remained undisclosed to me until 2021/2022.

A subsequent report, produced on 15 April 2022 for Katie Reay, solicitor, Legal Services, Northumberland County Council by the Northumbria Police Information Management Unit Disclosure Section, contains previously unknown information. The report cites me as Peter Dunne, DOB 24/10/1964, without a middle name, and later uses the variant "Peter Dunn."

The report references incident 158 dated 03/07/2021, claiming it originated from an Interpol Green Notice indicating that Peter Dunn from the Republic of Ireland has a locate-trace in place. The report asserts this is because I was supposed to be on a sex offender register due to a previous rape conviction, but had fled Ireland without complying with the register requirements.

The report further states that, during police attempts to engage, I was told that if I did not go inside, the conversation would occur on the doorstep for all to hear. This constitutes a breach of my right to private legal consultation under PACE 1984, Sections 58 and 62, and Article 6 ECHR, as it effectively threatened coercion and undermined my ability to obtain legal representation. This action by the police manifestly undermined the rule of speciality and jeopardised my right to a fair hearing, as well as my ongoing family court proceedings.

The report references a purported conviction on 01/07/2001 for sexual activity with a mentally impaired female adult. I explicitly stated that the police were jeopardising my upcoming court appearance by attending my home and demanded that they return with a lawyer.

Additional claims in the report include allegations made against me while living in Thailand, a historic conviction dated 8/2/1984 in Enniscorthy for unlawful carnal knowledge with a girl under 15, and a described modus operandi of taking girls under 15 with learning difficulties and having intercourse with them. No evidence of the 1984 case has ever been presented, and the stated modus operandi is entirely false. I have never been charged, investigated, or convicted of any offence in Enniscorthy in 1984. I have never lived in Thailand, and the related allegations are impossible. The 01/07/2001 conviction referenced does not exist.

These fabricated allegations, the threat to conduct a conversation publicly, and the delayed disclosure were later relied upon in family court proceedings. The reliance on false information amounts to perjury before the court and malfeasance in office, as officers knowingly presented inaccurate and fabricated claims. These actions manifestly undermined the rule of speciality, compromised procedural fairness, and materially prejudiced the outcome of the family court hearings.

The inclusion of these false allegations, misrepresentations, and the denial of access to legal counsel represents a serious breach of process, including:

Violation of Article 6 ECHR – right to a fair trial and legal representation.

Breach of PACE 1984, Sections 58 and 62, and Code C – denial of private consultation with a lawyer, and improper recording of unverified allegations.

Misrepresentation of factual and legal status in official police and social services documents.

Non-disclosure of relevant reports for over a decade, undermining my ability to challenge allegations.

Use of fabricated allegations in court, amounting to perjury before the court and malfeasance in office.

These combined actions constitute a manifest procedural failure, unsafe reliance upon false information, and ongoing prejudice in both family court and extradition proceedings.

57. Irish Proceedings 2001–2007 – Void Ab Initio and Ultra Vires

57.1. Foundational Invalidity of Irish Hearings

All Irish hearings from 2003–2007, including the two 2005 mistrials and the 2007 trial, are void ab initio and ultra vires under the Rule of Speciality.

Extradition proceedings were based on materially different allegations than those tried in Ireland:

2003 extradition alleged a 10-year-old victim.

Irish proceedings concerned a 20-year-old victim under Section 5(1) Sexual Offences Act 1993.

A 2002 baby referenced in the book of evidence was not disclosed during extradition, constituting a material speciality violation under Section 39, Extradition Act 1965 (Ireland).

57.2. DNA Retention Orders, Custody Records, and PACE Breaches

Three High Court DNA retention orders (2001–2002) were never disclosed during 2003 or 2008 extradition proceedings.

Custody records, exculpatory in nature, were similarly withheld.

Non-disclosure represents a breach of PACE 1984 (UK) and Irish disclosure law.

None of the DNA orders were served as ordered until included in the book of evidence in 2003, by which time they were spent, undermining legal identification and fairness.

Effect: Reliance on incomplete evidence vitiates all subsequent hearings and violates Article 6 ECHR.

57.3. Non-Disclosure of Second Defendant and 2002 Baby

Second accused: Not disclosed during extradition; referenced in the book of evidence.

2002 baby: Not disclosed during extradition; material fact not authorized, violating the Rule of Speciality.

57.4. Procedural Failures in 2005–2007 Irish Trials

57.4.1 Mistrials (2005)

1. First Trial:

Dismissed because alleged victim claimed “no”.

No sexual assault or rape charge filed, highlighting procedural failure.

2. Second Trial:

Dismissed because the term “sexual assault” appeared on a book of photographs shown to the jury, never served to the applicant, violating disclosure obligations under PACE 1984 (UK) and Irish law.

Demonstrates procedural unfairness and prejudice.

57.4.2 Third Trial (2007)

Proceeded against the applicant alone; same unaltered book of evidence from prior trials used.

Charge under Section 5(1), Sexual Offences Act 1993, involving a 20-year-old victim, materially different from 2003 extradition claims.

Change of defence counsel on second day without notice, violating:

Article 6(3)(b)-(d) ECHR – right to adequate legal representation.

Irish Constitution, Article 39.1 – right to fair trial.

Solicitor letter (20 November 2003) confirms applicant was never informed of the charges, demonstrating that the extradition hearing was vitiated by failure to inform me correctly of the reason for arrest, violating:

Article 5(1) ECHR (UK & Ireland) – right to be informed of reason for arrest and protection from punishment without trial.

57.5. Human Consequences and State Interference

Loss of son: Coventry Family Court ruling resulted in permanent and de facto loss of custody.

Loss of fiancée (2005): State interference compounded the personal impact.

Effect: No presumption of innocence remained; applicant suffered excessive state interference causing severe, permanent loss.

2005 hanging and amnesia: Applicant was subjected to a violent attack; the state was aware.

Evidence: 10 October 2005 High Court application withdrawn as a consequence of this attack.

Demonstrates state knowledge of personal harm while failing to protect fundamental rights.

57.6. Denial of Kosher Meals

attachmentsD.pdf

While on remand in Ireland, the applicant was denied kosher meals, in breach of a court order.

Constitutes a violation of Rule of Speciality, as well as Human Rights Act 1998 protections, which implicitly apply to all persons subject to extradition.

57.7. Evidential Failures

DNA and scientific evidence withheld.

Custody records withheld.

Book of evidence:

Contained references to second accused.

Referenced 2002 baby.

Included material from prior mistrials and untested allegations.

57.8. Effect: Proceedings relied on contaminated, incomplete, exculpatory-evidence-deficient material, violating constitutional and ECHR guarantees.

58. Coventry County Court (family division) – CV05P00514: Ultra Vires

attachmentsD.pdf

Case: Coventry County Court (family division) – Family Law Proceedings concerning Nathan Domek

Case Number: CV05P00514

Key Dates:

8 December 2005 – Court refused legal counsel

12 January 2006 – CAFCASS report issued by Alf Briscoe

58.1. Introduction

This argument asserts that the Coventry County Court (family division) acted ultra vires in CV05P00514. The court exceeded its lawful powers in multiple respects, conducting proceedings that were procedurally unfair, legally defective, and fundamentally unsafe. The combined actions of the court and CAFCASS Officer Alf Briscoe resulted in a miscarriage of justice, interfering with

Mr Peter Ivan Dunne's rights in ongoing criminal proceedings in Ireland, and undermining the integrity of the judicial process.

58.2. Factual Background

1. On 8 December 2005, Mr Dunne was denied legal representation, despite informing the court he could not secure or afford counsel.
2. On 12 January 2006, CAFCASS Officer Alf Briscoe issued a report conditioning welfare recommendations on Mr Dunne's cooperation with UK and Irish police, interfering with ongoing criminal proceedings.
3. Mr Dunne was using a Post Restante address, which was known to the court, yet he was not properly notified of hearings.
4. Two Irish witnesses, present in court, were refused the opportunity to testify or have statements read.
5. Wendy Dixon, Mr Dunne's fiancée until shortly before proceedings, was not subpoenaed, despite being the only witness capable of:
 - Attesting to the illegality of the 2003 extradition hearing
 - Confirming the immediate violation of the speciality principle
 - Verifying the accuracy of the court summary of evidence and false testimony
6. Witness statements and CAFCASS materials included references to:
 - The Irish extradition case
 - A non-existent 10-year-old victim
 - Alleged media publications in Rugby, UK
7. Police reports and other evidence related to allegations were withheld, preventing Mr Dunne from defending himself.

58.3. Grounds for Ultra Vires and Miscarriage of Justice

58.3.1 Denial of Legal Representation (8 December 2005)

Court acted beyond its statutory powers by proceeding without ensuring Mr Dunne had legal representation or an opportunity to secure counsel.

Violates Article 6(3)(c) ECHR and natural justice principles.

Impact: Mr Dunne could not challenge CAFCASS findings or present exculpatory evidence.

58.3.2 CAFCASS Deliberate Interference (12 January 2006)

Conditioning welfare findings on police cooperation interfered with ongoing Irish criminal proceedings, exceeding the court's jurisdiction.

Ultra Vires: Family court powers are restricted to child welfare matters; coercion concerning unrelated criminal investigations is outside statutory authority.

Authority:

Artico v Italy [1980] ECHR 8399/79

Al-Khawaja & Tahery v UK [2011] ECHR 26766/05

58.3.3 Obstruction of Witness Evidence

Two Irish witnesses and Wendy Dixon were denied opportunity to provide evidence.

Wendy Dixon was uniquely positioned to:

- Attest to the illegality of the 2003 extradition hearing

- Confirm the violation of the specialty principle

- Verify the accuracy of the court summary of evidence and identify false testimony

Ultra Vires: Denying access to a witness critical to the defence exceeds the court's duty to ensure fair trial and procedural justice.

Authority:

Re B (Children) [2008] EWCA Civ 889

R (M) v Family Court [2010]

58.3.4 Lack of Proper Notification / Post Restante Address

Proceeding without ensuring Mr Dunne received notice exceeded the court's procedural powers.

Effect: Deprived Mr Dunne of preparation time and ability to secure witnesses.

Legal Principle:

Article 6 ECHR – right to fair trial

Natural justice / audi alteram partem

58.3.5 Withholding of Police Reports & Evidence

Court acted ultra vires by making welfare determinations without providing access to police reports relating to allegations against Mr Dunne and his son.

Decisions were based on incomplete, inaccessible evidence, outside lawful authority.

58.3.6 Reliance on Extraneous / Fabricated Allegations

Statements referenced:

Irish extradition case

Non-existent 10-year-old victim

Media publications in Rugby, UK

Ultra Vires: Family court has no jurisdiction to adjudicate or rely upon extraneous criminal matters or media reports as evidence in child welfare proceedings.

Resulted in misleading the court and prejudicing the defendant.

58.3.7 Cumulative Ultra Vires Action & Procedural Prejudice

Procedural / Jurisdictional Failure	Ultra Vires Effect
Denial of legal counsel	Court ignored its duty to ensure fair representation
Obstruction of witnesses	Exceeded power by preventing critical evidence presentation
Lack of notification / Post Restante	Ignored procedural safeguards, denying meaningful access
CAFCASS coercion	Exceeded statutory powers by interfering in criminal matters
Withholding police evidence	Made determinations on incomplete record
Reliance on fabricated/extraneous allegations	Used evidence outside lawful jurisdiction
Result: The court's conduct went beyond its statutory powers, creating a fundamentally unsafe and ultra vires proceeding.	

58.4 Contempt, Family Law Interference, and Harassment

Coventry City Council, via social worker Masimba Ngulube, referenced a sealed Family Court order explicitly naming the father, his son, and the ex-partner (Urszula Domek), but not the father's current wife or daughter.

The council attempted to contact the father's current wife regarding the child, without lawful authority, and without notifying either the father or Urszula Domek, both of whom were legally entitled to notice and opportunity to respond under Children Act 1989, s.17 and s.47, and principles of natural justice.

The reliance on the court order to justify contact with non-parties was ultra vires and interfered with the administration of justice, breaching confidentiality and sealed order protections under FPR 2010 Part 12 and Administration of Justice Act 1960, s.12.

Precedent: *Re L (A Child) (Confidentiality: Contempt) [2009] EWCA Civ 1360* – unauthorized disclosure by third parties may constitute civil contempt where it undermines court authority.

Repeated attempts to contact the father's current wife using police intermediaries constitute harassment under Protection from Harassment Act 1997, as the conduct was targeted, unwelcome, and caused distress.

Disclosure to unauthorized persons also raises DPA 2018 / GDPR concerns, as personal data about the child and family was processed without lawful basis.

Conclusion: The council's actions demonstrate procedural unfairness, ultra vires reliance on an inapplicable order, potential contempt, harassment, and data protection violations.

59. London Magistrates Court – 2008 Extradition Hearing

59.1 Background and Context

The hearing arose from an extradition request under the European Arrest Warrant Act 2003, based on the 2008 EAW issued by the Dublin High Court, signed by Judge Michael Peart.

The 2008 EAW relied on allegations of sexual offences against a claimed victim aged 20 at the time, materially different from the 2003 extradition, which referred to a 10-year-old alleged victim who does not exist.

The Irish case underlying the EAW was fatally flawed:

- Multiple warrants failing on their face;
- Contradictory dates of birth;
- Misstatements of facts regarding alleged offences.

Consequently, the 2008 extradition proceeding violated the Rule of Speciality.

59.2 Critical Violations During Custody and Hearing

While in custody at the Magistrates Court, I was given a pre-packaged meal containing onions, to which I am severely allergic, and which was non-kosher, violating my recognized Jewish identity.

The court acknowledged the meal error.

This created a real and foreseeable risk to life (Article 2 ECHR) and violated Articles 8 & 9 ECHR, as incorporated under HRA 1998.

The violation occurred within the courtroom, directly affecting procedural fairness and impartiality of the hearing.

59.3 Withholding of Evidence / Article 6 HRA Violation

While on remand appealing extradition, the state withheld exculpatory material, including:
DNA orders relevant to alleged offences;

Custody and family court records.

Such non-disclosure constitutes withholding of evidence by the state, violating Article 6 HRA 1998.

Both the father and Urszula Domek, the child's mother, were entitled to notice and disclosure, which was denied, compounding procedural unfairness.

59.4 Violation of Speciality and Ultra Vires Proceedings

The 2008 EAW relied on allegations materially different from the 2003 extradition request:

2003: alleged 10-year-old victim (non-existent).

2008: alleged 20-year-old victim.

Additional flaws:

Incorrect or missing personal identifiers;

Contradictory addresses/dates of birth;

Non-disclosure of exculpatory evidence.

The Magistrates Court exercised jurisdiction over an ultra vires request, rendering proceedings unlawful.

59.5 Cumulative Effect

Life-threatening dietary violation + religious freedom breach + violation of speciality + withholding of exculpatory evidence = continuing unlawful detention.

Court failures to prevent or remedy violations compromised impartiality and jurisdiction, vitiating all subsequent proceedings.

Non-disclosure to the father and Urszula Domek constitutes state misconduct and further breach of Article 6 HRA 1998.

60. Northumberland Magistrates Court – Sex Offender Registration (SOR) Hearing

attachmentsC.pdf

60.1. Procedural Background and Failures

1. The hearing arose from a police investigation triggered by a Green Notice and a false allegation of non-compliance with Irish SOR requirements.

R v Horseferry Road Magistrates, ex parte Bennett [1994] 1 AC 42 – improper or unlawful conduct by authorities renders subsequent proceedings ultra vires.

2. The Green Notice was not disclosed prior to the hearing, denying the applicant the ability to respond.

R v W [2005] EWCA Crim 1720 – non-disclosure of material evidence violates procedural fairness.

3. No evidence was served in advance; attempted service minutes before the hearing precluded proper defence.

DPP v Special Criminal Court ex parte Cahill [1983] IR 448 – failure to serve exculpatory material undermines fair trial rights.

4. The applicant was refused legal counsel and had no opportunity to be represented.

Article 6(3)(c) ECHR – right to legal assistance.

R v McGarry [2007] 2 Cr App R 20 – refusal of counsel where right exists vitiates proceedings.

5. The court refused to hear any submissions from the applicant.

Al-Khawaja & Tahery v UK [2011] ECHR 26766 – denial of opportunity to make oral submissions breaches Article 67.

6. Applicant was initially promised a full hearing, later denied.

Bradley v United Kingdom [1980] EHRR 35 – misleading assurances of hearing rights create procedural unfairness.

60.2. Orders Issued and Procedural Defects

7. **Temporary SOR converted to permanent without a hearing.**

R (Beeson) v SoS for Justice [2009] EWHC 2136 (Admin) – post hoc amendment of orders without hearing violates natural justice.

Effect: vitiates both temporary and permanent orders.

8. **Material evidence remains undisclosed.**

R v H [2004] EWCA Crim 1540 – trial using undisclosed material is unsafe.

9. **Police statements and records relevant to defence were withheld.**

PACE 1984, Sections 3 & 7 – duty to disclose material evidence.

R v Ward [1993] 97 Cr App R 258 – non-disclosure of statements constitutes miscarriage of justice.

60.3. Improper Use of Foreign Documents

10. Irish court certificate of sentence reclassified as an “endorsement” by the English court.

Removes the necessary sentence element for SOR registration.

Exculpatory: contains different date of birth.

English courts lack authority to reclassify foreign court orders.

Re Ismail [1999] 1 AC 320 – foreign convictions/orders must retain original legal character.

R v Hickey [2005] EWCA Crim 1461 – courts cannot reinterpret foreign judgements to create new legal effects.

60.4. Unlawful Police Intimidation and Questioning of Family Members

11. Police used unlawful intimidation tactics to gain entry to the applicant's home.
12. Police questioned the applicant's wife without a translator and without legal counsel, in violation of PACE 1984 and Article 6 ECHR.
13. Police questioned the applicant's daughter under the guise of a welfare check, when in fact the questioning was part of a criminal investigation into the applicant.

Effect: Misrepresentation and coercion of family members constitutes abuse of process and denial of due process.

R v Horseferry Road Magistrates, ex parte Bennett [1994] 1 AC 42 – improper investigative conduct can invalidate proceedings.

Re H (Minors) (Sexual Abuse: Standard of Proof) [1996] AC 563 – coercive questioning of minors in criminal investigations constitutes procedural unfairness.

60.5. Manifest Unlawfulness

The Northumberland SOR hearing is manifestly unlawful:

1. Non-disclosure of Green Notice, police statements, and material evidence (*R v W* 2005; PACE 1984).
2. Denial of legal representation and right to be heard (Article 6 ECHR; *R v McGarry* 2007).
3. Conversion of temporary to permanent SOR without hearing (*Beeson* 2009).
4. Improper reliance on foreign documents, reclassified contrary to law (*Re Ismail* 1999; *R v Hickey* 2005).
5. Unlawful intimidation and coercive questioning of family members, violating procedural fairness (*Horseferry* 1994; *Re H* 1996).

61. Jurisdictional Defects, Procedural Invalidity, and Article 6 Violations in Northumberland Family Court Proceedings

Case No: NE21C50153

attachmentsD.pdf

61.1. Ultra Vires Origin and Void Ab Initio Nature of Proceedings

1. From the moment of inception, the entire chain of proceedings under Case No:

NE21C50153 is ultra vires due to:

Direct involvement of police actions in the removal of the child;

Reliance on an unlawfully obtained Green Notice issued by Irish authorities;

Reliance on a Sex Offenders Register (SOR) order premised on unserved and procedurally defective evidence;

Reliance on the ICS Coventry report (28 October 2008), which contained false criminal allegations that were suppressed and not disclosed until 2021;

Reliance on the SW83333 / Swiet report, which is manifestly inaccurate, repeating false claims of non-existent victims and convictions, making a completely unfounded assertion that the Petitioner worked for MI6, and adding fabricated claims of rape in Thailand against both a 10-year-old and an adult woman—allegations that are entirely baseless as the Petitioner has never been to Thailand.

While I believe my ex partner may have worked for British Intelligence, she certainly worked for MOD, I have never held MI6 in enough esteem to have a coffee with, let alone work for.

2. The Green Notice was never served on the Petitioner, and no service occurred prior to the Magistrates' Court hearing, depriving him of notice and opportunity to respond.

Consequently:

The SOR order, upon which subsequent custody and family proceedings were premised, is void ab initio;

All derivative actions, hearings, and orders flowing from this defective SOR order are legally invalid.

3. The Irish foundation of the case, KK24/03, is itself in violation of the principle of speciality and void ab initio due to procedural irregularities, including violations of PACE 1984 at Nuneaton Court (2003).

4. The chain of claims, evidence, and derivative proceedings constitutes fruit of the poisonous tree because:

The SOR was obtained on defective and unserved evidence;

The Green Notice was procedurally defective;

Irish foundational documents (including the forged conviction date) invalidate any derivative reliance;

The ICS Coventry report contained fabricated allegations that were material to proceedings yet withheld;

The SW83333 / Swiet report compounded the procedural and evidentiary defects, adding criminally relevant falsehoods and claims of multiple non-existent victims.

5. The unlawfulness is manifest and structural:

Police intervention and “safeguarding” actions were premised on unserved notices and unverified criminal allegations;

Family Court proceedings incorporated criminally relevant accusations without elevating to criminal procedural standards;

UK and Irish authorities jointly acted without lawful jurisdiction, consent, or adherence to statutory and constitutional requirements;

Inclusion of ICS Coventry and SW83333 reports introduced additional false evidence, exacerbating procedural unfairness.

6. The cumulative effect is that all proceedings, evidence, and determinations are ultra vires, procedurally invalid, and void ab initio from the moment the Green Notice, SOR, ICS Coventry report, SW83333 report, and underlying Irish case were invoked.

61.2. Jurisdictional Context

1. The child remains resident in the United Kingdom, establishing habitual residence under Brussels II bis (Council Regulation (EC) No 2201/2003, Article 8). On this basis, the UK Family Court retains exclusive jurisdiction over parental responsibility.

2. Actions arising from these proceedings forced the father to relocate to the Republic of Ireland, resulting in:

Loss of the family home;

Loss of employment and financial stability;

Loss of proximity and daily access to his wife and daughter;

Collapse of ordinary support networks.

These consequences occurred at the outset, creating immediate and irreversible disruption to the family unit.

3. The Petitioner was placed at a severe disadvantage from the beginning, both emotionally and procedurally, making it impossible to meaningfully participate in proceedings or preserve familial relationships. This predetermined catastrophic family loss effectively guaranteed harm regardless of later judicial outcomes.

4. Compounding this harm, the father was required to engage in Irish legal proceedings directly linked to the UK case, without adequate counsel or resources. These parallel obligations:
 - Divided his attention and financial capacity;
 - Exposed him to procedural inequities;
 - Further compromised his ability to contest allegations or protect his parental role.
5. From inception, the proceedings were structurally prejudicial, making any claim of procedural fairness illusory and ensuring that irreparable harm to the family was effectively inevitable.

61.3. Breach of Brussels II bis

1. Article 8 confers exclusive jurisdiction on the courts of the child's habitual residence.
2. Article 15 allows referral to another Member State only with formal request and consent.
No such referral to Irish courts occurred.

Authorities:

Re I (A Child) [2009] UKSC 10

A v B [2006] IESC 52

3. The UK court therefore acted ultra vires by asserting jurisdiction over matters directly affecting the father in Ireland without Irish consent.

61.4 Procedural Defects and Police Safeguarding Action

1. Following SOR obligations, the father was briefly arrested (under one hour) by police claiming safeguarding as justification for the child's removal.
2. During this period:
 - The father was not provided criminal-law counsel;
 - The child was removed while the father was in custody, before independent judicial review;
 - The local authority applied to the Family Court for custody while the child remained under police safeguarding orders.
3. These events blur the line between civil and criminal law, invoking criminal-law procedural safeguards despite the civil nature of the family proceedings.

(a) Harassment through repeated and unreasonable visits

4. Police records confirm attendance at the family home around half 11 at night (23:30 hours, Report C028666/21). The report records that Peter Dunne “was visibly shaken” and officers threatened to conduct questioning “on the doorstep for all to hear” if he refused entry.

Such timing is manifestly unreasonable for a welfare visit, absent imminent danger.

It caused unnecessary alarm and humiliation, consistent with harassment under the Protection from Harassment Act 1997.

Case reference: *Hayes v Chief Constable of Merseyside [2011] EWCA Civ 911* – repeated or disproportionate police visits can constitute harassment.

(b) Unlawful questioning without legal safeguards

5. During the same late-night visit, police attempted to question both the father and his wife about historic allegations, refusing to disclose the grounds, and attempting to separate him from his partner. The report notes: “He asked why and he was told that that was not for him to know at this time.”

Such questioning engages Article 6 ECHR, as it was intended to elicit potentially incriminating responses linked to historic allegations.

Case reference: *Murray v UK (1996) 22 EHRR 29* – denial of timely legal advice renders proceedings unfair.

(c) Misuse of police powers of entry

6. On a subsequent occasion (Report C043708/21), officers recorded that “POLICE ENTERED UNDER SEC 17” despite no evidence of immediate risk to life or limb. The child was “in good spirits” and “no immediate concerns” were noted.

This constitutes misuse of s.17 PACE 1984, which permits entry only in narrowly defined emergencies.

Case reference: *O’Hara v Chief Constable of RUC [1997] AC 286* – police belief must be subjective and objectively reasonable; reliance on historic allegations without present risk fails this test.

(d) Unlawful deprivation of family life

7. In Report C044049/21, it is recorded that while the father attended North Tyne Magistrates’ Court, “the decision was made to take Rebecka into police protection... for a full safeguarding assessment.”

Section 46 Children Act 1989 powers are emergency-only and should be reserved for imminent and serious danger. No such danger was documented; prior reports

repeatedly described the child as “fit and well,” “very pleasant,” and “in good spirits.”

Case reference: *K. and T. v Finland (2001) 36 EHRR 255* – removal without judicial process violates Article 8 ECHR, absent immediate threat.

(e) Course of conduct

8. Taken cumulatively, the reports demonstrate:

Repeated late-night, uninvited visits;
Threats of public doorstep questioning;
Questioning without disclosure or legal representation;
Unlawful forced entries without imminent risk;
Emergency removal of a child in the absence of emergency grounds.

9. This sequence constitutes a course of conduct that:

Interfered disproportionately with the family’s Article 8 rights;
Denied the father his Article 6 rights (fair trial and legal advice);
Falls squarely within the meaning of harassment under the Protection from Harassment Act 1997.

(f) Coventry City Council interference with wife and daughter

10. A letter dated 12 February 2009 from Coventry City Council, Masimba Ngulube, Social Worker, was sent to the father’s wife (Urszula Domek), undisclosed to the father at the time, regarding an order concerning his son from a prior family law case to which his wife and daughter were not parties.

The council requested that the wife contact social care via police regarding Rebecka, despite her and the father having no legal obligation under the original order, and without providing the father notice or opportunity to be heard.

This constitutes:

Withholding of evidence and procedural unfairness, in violation of Article 6 HRA 1998;
Interference with family life (Article 8 HRA 1998);
Potential harassment under Protection from Harassment Act 1997, by repeated unsolicited demands and threats of enforcement via police.

The action disclosed confidential court information to third parties, raising questions of contempt of court, in addition to violating the rights of both the father and the

mother, both of whom were legally entitled to be informed of and participate in any proceedings impacting their child.

61.5 English Law Considerations

1. The UK Family Court retained exclusive jurisdiction over the child under Brussels II bis.
2. Proceedings relied on multiple fabricated or materially false allegations, including those documented in 02-11-2021 Risk Assessment of Choi Yeng Gan (G).pdf:

Alleged criminal conduct linked to the SOR, including multiple alleged victims and purported convictions, none substantiated;

Police safeguarding interventions conducted without independent judicial oversight, during which the father was briefly arrested and denied criminal-law counsel;

The ICS Coventry report, suppressed until 2021, containing fabricated criminal allegations;

The SW83333 / SWIET report, presenting further fabricated allegations, including:

Non-existent victims;

False claims of MI6 employment;

Manifestly false rape allegations relating to Thailand, where the father has never been, amounting to fresh criminal accusations outside the Irish case, violating the principle of speciality;

Wholly unfounded claim that the father “was wrongly convicted of raping a child and a woman in Thailand and being raped himself whilst in prison due to being labelled a sex offender”;

Materially misleading assertion that the father “was recently contacted by an ex-fiancée that he resided with whilst working in Singapore as an engineer approximately 10 years ago,” when he never cohabited with the alleged ex-fiancée;

Importation of Warwickshire Children’s Services material, alleging that “Nathan told his mother that daddy hurt his bits,” despite no evidence, no investigation, and no opportunity to respond;

Statement presented to an English court that, upon release on 05/07/2013, the father was subject to Part 2 of the Sex Offenders Act 2001 “for an indefinite period but did not engage with this process,” constituting

unproven criminal accusations in another jurisdiction, advanced without proof or lawful jurisdiction, violating the principle of speciality;
Mischaracterisation of the 2007 Kilkenny Circuit Court trial as involving a 10-year-old girl, when the matter concerned an adult, inflating perceived risk and supporting abuse of process;
Coventry City Council letter dated 12 Feb 2009, undisclosed to the father, requesting his wife contact social care regarding Rebecka, interfering with the family unit and breaching confidentiality and court orders.

3. The 2003 extradition from the UK to Ireland further demonstrates abuse of process, as the Irish proceedings reframed historical allegations outside their actual legal scope, violating the principle of speciality and Article 6 ECHR protections.
4. The requirement for the father to respond to these unproven allegations triggered full Article 6 ECHR protections, including the right to criminal-law representation. The court failed to elevate proceedings to criminal procedural status, denying due process.
5. Cross-border hearings via video-link while residing in Ireland were conducted without authorization from Irish authorities, breaching MLAT obligations and Hague Evidence Convention requirements.
6. Reliance on undisclosed, fabricated, or unverified evidence contravened:
 - PACE 1984, ss. 3, 15 & 23 (UK);
 - Criminal Justice Act 2011 (Ireland);
 - Garda Síochána Act 2005 (Ireland);
 - Article 6 ECHR (fair trial and equality of arms);
 - Protection from Harassment Act 1997 (course of conduct causing alarm or distress).

Authorities:

- Re I (A Child) [2009] UKSC 10
 - R v H and C [2004] UKHL 3
 - Re B (Children) [2008] UKHL 35
 - Re W (Children) (Abuse: Oral Evidence) [2010] UKSC 12
 - McMichael v UK (1995) 20 EHRR 205
7. These procedural defects, combined with **wholly untested and false criminal allegations**, mischaracterisation of prior convictions, and **interference by Coventry City Council with the father's wife and daughter**, render UK proceedings **ultra vires and voidable**, amounting to a **denial of natural justice**.

61.6. Criminal-Law Procedural Overlay and Article 6 Violations

1. Fresh criminal allegations, including multiple alleged victims and purported convictions, were presented in family proceedings.
2. Article 6 ECHR guarantees:
 - Fair trial;
 - Criminal-law counsel;
 - Presumption of innocence.
3. Civil representation alone was insufficient, as the court did not formally elevate proceedings to criminal procedural safeguards, rendering the father effectively **unrepresented for criminal-law purposes**.

61.7. Cross-Border Procedural Violations

1. Hearings conducted via Microsoft Teams while the father was in Ireland were **unauthorised by Irish authorities**.
2. No MLAT or Hague Evidence Convention authorisation was obtained.
3. Evidence, submissions, and determinations from these hearings are **procedurally invalid**.

61.8. Breach of UK–EU Withdrawal Agreement Obligations

1. Judicial cooperation under UK–EU Withdrawal Agreement, Title VI, preserved cross-border Brussels II bis procedures.
2. The Newcastle Family Court failed to comply, conducting hearings and issuing orders **without following the framework**, constituting a breach of UK statutory obligations and Irish sovereign jurisdiction.

61.9. Irish Law Considerations

1. The case is founded on **KK24/03**, itself in violation of the principle of speciality.
2. Irish authorities issued a Green Notice yet failed to serve it on the Petitioner, depriving him of notice and opportunity to respond.
3. Irish court documents, including the conviction and sentence dated 6 October 2007, are **exculpatory**, negating criminal liability. The forged file date of 6 October 2009 demonstrates procedural irregularity.

4. The SOR entry was obtained using unserved evidence, including a conviction and sentence order later altered by the Magistrates' Court to be interpreted as an endorsement.
5. Irish law imposes a duty to protect the family; yet the State facilitated child removal and cross-border interference, violating constitutional protections.
6. Irish law applies because the case is directly rooted in KK24/03, and all subsequent actions—Green Notice, SOR, ICS Coventry report, SW83333/Swiet report, cross-border interventions—stem from that flawed foundation.

61.10. Psychological Harm, Family Destruction, and Irreparable Damage

1. Proceedings directly caused **total breakdown** of the few remaining family relationships.
2. Forced relocation, unlawful child removal, criminally relevant allegations, cross-border procedural violations, reliance on flawed foundational documents, and suppression of ICS Coventry and SW83333 reports irreparably disrupted familial bonds.
3. Harm meets threshold of **psychological torture**:
 - Article 3 ECHR — prohibition of inhuman or degrading treatment;
 - Article 8 ECHR — right to respect for private and family life;
 - Domestic obligations under Irish Constitution and UK human rights law.
4. Harm is **permanent**, constituting the **fourth avoidable family loss** inflicted by UK and Irish authorities.
5. Petitioner seeks **whole-life damages** to reflect total disruption of family life, psychological trauma, and irreversible loss of parental and familial relationships.

62. Withheld Evidence

1. Delay in Disclosure

It has taken more than a decade for certain police and counsel reports from the United Kingdom to be disclosed. It remains unknown how many additional tainted or false reports exist. Intelligence and agency records certainly exist regarding me, as evidenced by my recent questioning at Stansted Airport upon return to the UK, where Border officials demonstrated reliance on undisclosed records.

2. Withheld Records under English Law

DNA orders remain unserved

Associated scientific records remain unserved

Exculpatory custody records remain unserved

3. Withheld Records under Irish Law

Trial transcripts remain unserved

DNA scientific records remain unserved

The 6 October 2007 Conviction and Sentence Order remains unserved

4. Interpol Records Withheld

The 2021 Interpol Green Notice remains unserved under both English and Irish law.

In 2003, oral reference was made in court to Interpol tracing me to England for the Nuneaton hearing/extradition. However:

No disclosed Interpol records exist for that year.

No disclosed Interpol records exist for 2008.

In extradition matters, it is normal procedure to utilize the Interpol notice system, yet here, records appear deliberately suppressed or destroyed.

5. Legal Effect

The cumulative withholding of police, counsel, forensic, custody, trial, and Interpol records across two jurisdictions:

Prevents proper exercise of appeal rights.

Denies access to exculpatory material.

Constitutes a breach of fair trial guarantees under Article 6 ECHR.

Strongly supports the inference of deliberate concealment and systemic miscarriage of justice.

63. Jewish Identity, Religious Abuse, and Continuing Detention

63.1. Recognition of Jewish Identity

I have consistently asserted my Jewish identity before UK and Irish courts.

My identity has been unquestionably accepted by: UK Social Services, Courts, CPS, Police; Irish Courts, DPP, and Gardaí.

Status: settled law and fact.

63.2. Systematic Violations of Religious Rights

1. Kosher food denial during incarceration and extradition custody:

Duration: >4 years, including remand, incarceration, and 2008–2009 extradition custody at Westminster Magistrates Court.

$365 \text{ days/year} \times 4 \text{ meals/day} \times 4 \text{ years} = 5,840$ discrete violations of Articles 8 & 9 ECHR 2003 alone.

Excludes additional violations during remand prior to trial and sentence, which further compounded abuse.

2. 2008–2009 Magistrates Court incident (courtroom violation):

While in the custody suite at Westminster Magistrates Court during extradition proceedings, I was provided non-kosher food containing onions, to which I am highly allergic.

I personally raised this in court as a violation of Articles 2, 3, 8, and 9 HRA 1998. The court ignored my claim and continued proceedings without remedying the violation.

The violation occurred within the courtroom itself, directly vacating the impartiality of the court.

By failing to respect my recognized religious rights while I was present in court, the court lost impartiality and jurisdiction, rendering any subsequent hearing and judgement unlawful.

This also constitutes a violation of the Rule of Speciality, as my religious rights were explicitly recognized in extradition challenges but disregarded in both UK and Ireland regardless.

3. Other systemic abuses during custody:

Given food containing Onion on multiple occasions.

Given pork and Onion in meals at Cork Prison, amounting to deliberate violation of articles 2, 3, 8 & 9 of the ECHR2003.

Solicitor letter dated 20 November 2003 (Cork Prison) specifically addressed kosher food, yet the order was not enforced.

4. Legal significance:

ECHR Articles 8 & 9 – private/family life and freedom of religion

ECHR Article 3 – inhuman and degrading treatment due to prolonged systematic abuse

ECHR Article 2 – Right to life, this is invoked with risk to life by negligence or deliberate act.

HRA 1998 – incorporates above rights into UK law

Violation of the Rule of Speciality – recognized religious rights explicitly cited in extradition proceedings were ignored, rendering detention ultra vires.

Courtroom violation nullifies jurisdiction and impartiality, vitiating subsequent hearings and judgements.

63.3. Compounded Familial and Psychological Harm

Permanent loss of son (2003) made permanent in 2006 due to Coventry court ruling, no contact since.

Permanent loss of former fiancée (2005) almost no contact since 2005.

Loss of contact with daughter for 5 years and subsequently lost contact in January 2025, now permanent severance.

Loss of contact with my wife for about 1 year and subsequently lost most contact in January 2025, relationship permanently destroyed, minimal contact.

Loss of contact with Irish family occurred from 2003 onward and by 2013 was almost total loss and now only limited, difficult contact remains with my brother.

Daily psychological impact of separation, deprivation of family bonds, and repeated legal harassment.

Combined with kosher food violations, this constitutes continuing, torturous abuse over 4+ years, including Magistrates Court custody in 2008–2009.

63.4. Legal Consequence on Detention

1. The extreme severity of violations (5,840+ discrete instances, excluding remand prior to trial and sentence) alone renders my continuing detention unlawful, including detention during extradition custody in 2008–2009.

2. Detention under these conditions breached:

ECHR Article 3 – inhuman/degrading treatment

ECHR Articles 8 & 9 – systematic violation of private, family, and religious life

HRA 1998 – incorporation of ECHR into UK law

Rule of Speciality – recognition of my religious rights in extradition proceedings was ignored

PACE 1984 – failure to provide for lawful detention, access to counsel, disclosure, and welfare

PACE 1984, articles 2,3,8 & 9 of HRA 1998 were all violated by the incident at the Magistrates Court.

3. Judicial recognition of illegality with case law citations:

Aydin v Turkey [1997] ECHR 57 – prolonged abuse causing severe psychological suffering constitutes inhuman/degrading treatment.

Ramirez Sanchez v France [2006] ECHR 594 – psychological trauma from state actions can satisfy Article 3 criteria if severe and prolonged.

R v Horseferry Road Magistrates, ex parte Bennett [1994] 1 AC 42 – unlawful state conduct, including detention under known procedural violations, renders detention abusive.

R v Governor of Wormwood Scrubs ex parte Baldwin [1997] 2 All ER 165 – prolonged deprivation of legally protected rights during custody renders imprisonment unlawful.

Violation occurring in court: where abuse happens within the courtroom affecting procedural fairness, impartiality, and jurisdiction, subsequent hearings and judgments are ultra vires (see general principles of natural justice and procedural fairness under *Anufrijeva v Southwark LBC* [2003] EWCA Civ 1406).

Therefore, my detention and all proceedings during this period, including those conducted in the Magistrates Court itself, were legally unsustainable, independent of other procedural or trial defects.

64. Abuse of Family

64.1 Separation from Son (2003):

Unlawful extradition in 2003 removed the applicant from his son, based on a **non-existent victim**.

Subsequent court actions compounded the damage, accepting **false allegations from the mother** as credible due to the extradition framework.

64.2 Daughter Taken into Care (2021):

Applicant's daughter was removed from his care, resulting in the **loss of her home, disruption of education, and destruction of social standing at school**.

This caused the **permanent loss of paternal relationship**.

64.3 Sibling Separation:

The applicant's son and daughter have **never met**, a direct result of cumulative state abuses and family law interventions.

64.4 Breakdown of Cohabiting Relationship:

The applicant's fiancée, recognized as "family" under English law due to cohabitation in Birmingham, was alienated by state actions, leading to **breakdown of the relationship**.

64.5 Marital Breakdown (2025):

The applicant's marriage ended in total breakdown in 2025, exacerbated by ongoing state interference and failures in family proceedings.

64.6 Periods of Non-Communication:

2008–2013: No communication with daughter.

2009–2010: No communication with wife.

64.7 Loss of Residence and Homelessness:

Applicant lost multiple homes as a direct consequence of state actions: 2003, 2005, 2007, 2008, 2017, 2021, and 2024.

Currently homeless, despite holding **dual citizenship of the UK and Ireland**, effectively **displaced permanently from both countries** and rendered **stateless in practice**.

64.8 Loss of Business:

Businesses were lost in 2003 and 2008, attributable to interference and legal harassment by state authorities.

64.9 Loss and Difficulty in Employment:

Loss of work occurred in 2003, 2005, 2008, 2017, 2021, and 2024, with **exceptionally difficult circumstances securing new employment** as a direct consequence of state actions and the ongoing miscarriage of justice.

64.10 Cross-Reference to ECHR Violations:

The above abuses constitute clear violations of **Article 8 (Right to Private and Family Life)** and **Article 14 (Prohibition of Discrimination)** of the **European Convention on Human Rights (ECHR 2003)**, as the state's actions directly interfered with the applicant's family

relationships, discriminated against him as a Jewish parent, and created long-term, systemic harm.

The applicant's **homelessness and effective statelessness** further exacerbate these violations, highlighting **ongoing interference with family, private life, and personal security**.

65. Recognition of “Palestine” – Ultra Vires, Void Ab Initio, and Evidence of Institutional Bias

65.1. Context and Risk

65.1.1. On or about 28 May 2024, the Government of Ireland issued a public declaration recognising a “State of Palestine” that includes the Gaza Strip, a territory presently under the control of Hamas, an internationally proscribed terrorist organisation. The United Kingdom has recognized Palestine as of the 21st Sept 2025.

65.1.2. Recognition by Ireland and UK materially exacerbates threats from terrorist and dictatorial actors domestically and internationally.

65.1.3. Such recognition constitutes direct evidence of institutional bias embedded in state policy, aligned with prior systemic failures in both Irish and UK legal institutions.

65.1.4. Since 7 October 2023, there has been a documented increase in antisemitic bias, attacks, and threats worldwide, directly affecting the safety of Jewish individuals, including the applicant.

- <https://www.adl.org/resources/report/global-antisemitism-selected-incidents-2023>
- <https://cst.org.uk/data>

65.2. Constitutional and Legal Obligations (Ireland and UK)

65.2.1. Article 41.3.1° of the Constitution of Ireland obliges the State to respect, defend, and vindicate the personal rights of citizens.

65.2.2. Article 29 mandates that international relations be conducted in accordance with principles of international law and justice.

65.2.3. The United Kingdom is bound by the Human Rights Act 1998 (HRA 1998), and Ireland by the European Convention on Human Rights Act 2003 (ECHR 2003). Public authorities must act compatibly with Convention rights; courts must have regard to ECtHR jurisprudence.

65.2.4. Recognition of “Palestine” by Ireland, and proposed UK recognition, contravenes these obligations by:

- a. Endangering the life, liberty, and religion of all people under the governance of terrorist or

dictatorial regimes in Gaza, the West Bank, and the broader region;

b. Providing de facto support or reward to Hamas, the Palestinian Authority, and associated entities, whose governance and policies have repeatedly been demonstrated to threaten civilian populations;

c. Evidence includes worldwide Gaza protests, obstructions, and violent demonstrations, illustrating that these regimes actively encourage hostility and violence; recognition or support inherently amplifies terrorist activities and risks to all civilians;

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<https://acleddata.com/infographic/infographic-global-demonstrations-response-to-the-israel-palestine-conflict>

d. Violating rights under ICCPR (Articles 2, 6, 7, 14, 17–19, 21, 22, 25, 27) and ICESCR (Articles 6, 7, 11–13, 15); [Montevideo parallels: effective government, capacity to enter international relations];

• https://treaties.un.org/doc/treaties/1976/03/19760323%2006-17%20AM/ch_iv_04.pdf

• https://treaties.un.org/doc/treaties/1976/01/19760103%2009-57%20PM/ch_iv_03.pdf

• <https://treaties.un.org/pages/showdetails.aspx?objid=0800000280166aef>

e. Breaching ECHR/HRA rights (Articles 2, 3, 5, 6, 8, 9, 14, Protocol 1 Article 1);

• https://www.echr.coe.int/documents/d/echr/convention_ENG

• <https://www.legislation.gov.uk/ukpga/1998/42/contents>

f. Establishing institutional bias that compounds prior miscarriages of justice and systemic failure;

g. Increasing threats and attacks against Jews worldwide, including Ireland and UK, which demonstrates the material harm caused by recognition.

65.3. Legal Impossibility of Palestinian Statehood under Human Rights Obligations

65.3.1. Definition of Lawful Statehood

A lawful state in international law requires more than mere control over territory or population; it must satisfy binding obligations and legitimacy criteria:

a. Respect for the **right of peoples to self-determination** (UN Charter art. 1(2); UNGA Res. 1514 (XV); ICJ *Namibia* (1971));

b. Protection of **fundamental human rights** (UDHR 1948; ICCPR; ICESCR; ECHR);

c. Effective and **legitimate governance**, ensuring rule of law, judicial independence, and treaty compliance (ICCPR arts. 2–14; ICESCR arts. 6–7, 11–13; HRA 1998 Sections 6–7);

d. Compliance with **peremptory norms prohibiting acquisition of territory by force** (*jus cogens*; UN Charter art. 2(4); ICJ *East Timor* (1995));

e. Recognition and continuity of statehood under occupation or suppression, without legitimising authorities that violate self-determination (ICJ *Namibia* (1971); Baltic States 1940–1991).

65.3.2. Failure of Hamas and Fatah to Meet Statehood Criteria

The entities controlling Gaza (Hamas) and parts of the West Bank (Palestinian Authority/Fatah) fail these obligations:

- a. No unified governance or judicial independence; institutions remain factionally controlled;
- b. Systematic human rights violations, including hostage-taking, extrajudicial killings, and suppression of civilian freedoms;
- c. Inability to comply with binding international obligations, including ICCPR, ICESCR, and UN Charter duties;
- d. Reliance on violence and jihad as political tools, in violation of peremptory norms and human rights law.

65.3.3. Limits on Self-Determination

While the Palestinian people have a legitimate aspiration to self-determination, that right is *qualified* under binding international law:

- a. Self-determination must respect the rights of others and comply with international law;
- b. ICJ *Namibia* (1971) establishes that authorities denying self-determination may not be recognised; recognising Hamas or Fatah entrenches denial of genuine self-determination;
- c. Hamas/Fatah deny:
 - i. Free and fair elections (none since 2005);
 - ii. Independent and impartial judicial systems;
 - iii. Effective and impartial policing;
 - iv. Economic freedom and development;
 - v. Genuine treaty-based independence;
- d. Hamas and Fatah persistently interfere with Israel's sovereignty and territorial integrity, in breach of the prohibition on intervention and use of force (UN Charter art. 2(4); ICJ *Nicaragua v. United States* [1986], paras. 202–209);
- e. Self-determination cannot justify jihad, intifadas, or genocidal attacks, including those of 7 October 2023;
- f. It cannot be exercised in a manner that infringes on the rights, lives, or sovereignty of neighbouring states.

65.3.4. Lawful Path to Statehood

The only lawful avenue for Palestinian statehood is **negotiation and treaty-based agreement**, consistent with:

UN Charter obligations;

Binding ICCPR and ICESCR treaty obligations;

Prohibition on recognition of authorities denying self-determination (ICJ *Namibia* 1971).

Repeated refusals by Hamas, Fatah, and predecessors to engage in lawful negotiation, relying instead on violent actions, preclude lawful claims to territory.

65.3.5. Breach of Territorial Sovereignty

Recognition of Palestinian entities under current conditions violates:

- a. **Uti possidetis juris**, under which Israel's lawful borders are the Mandate boundaries of 1948, never lawfully altered;
- b. **Prohibition on acquisition of territory by force** (UN Charter art. 2(4); customary international law; ICJ *East Timor* 1995);
- c. **Namibia principle**, forbidding recognition of authorities that deny self-determination;
- d. Binding ICCPR and ICESCR obligations to ensure rights, security, and governance for all civilians.

Recognition thus constitutes a **political and technical breach of Israel's sovereignty**, entrenching illegitimate factions.

65.4. Rewarding Genocide and Terrorism

65.4.1. On 7 October 2023, Hamas executed coordinated attacks on Israel, killing over 1,200 civilians and abducting more than 250 hostages, meeting the definition of genocide under Article II, Genocide Convention (1948).

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https://www.un.org/en/genocideprevention/documents/atrocities-crimes/Doc.1_Convention%20on%20the%20Prevention%20and%20Punishment%20of%20the%20Crime%20of%20Genocide.pdf

65.4.2. Sustained attacks by Hezbollah, Iran, and the Houthis, conducted in concert with Hamas, demonstrate a coordinated regional strategy of armed violence targeting civilian populations. These actions meet the threshold of "terrorist activity" under the Criminal Justice (Terrorist

Offences) Act 2005 (Ireland), Part 2, which prohibits participation in and encouragement of terrorist groups.

65.4.3. The Palestinian Authority operates the so-called “Pay-for-Slay” stipend policy, under which families of individuals who commit acts of terrorism receive monetary compensation. This constitutes an incentive structure for terrorism and amounts to material support within the meaning of ss.11–13 Terrorism Act 2000 (membership, support, and encouragement of a proscribed organisation). Any formal recognition of Palestine by Ireland or the UK, in this context, materially rewards these genocidal and terroristic practices.

65.4.4. Recognition as an incentive and Hamas’ own characterisation.

Following the October 7, 2023 attack (which Hamas named Operation “Al-Aqsa Flood”), senior Hamas figures and Hamas-aligned publications explicitly linked subsequent international moves toward Palestinian recognition to the events of that day. For example, a senior Hamas political-bureau member stated on Al Jazeera that recognition by several Western countries was “one of the fruits of October 7,” and that the operation demonstrated that “victory over Israel is not impossible.”

Hamas’ own 16-page report and subsequent statements (published by Hamas / Hamas-aligned outlets) set out Operation Al-Aqsa Flood as a deliberate political act with aims beyond immediate military effects, describing the operation’s objectives and political consequences. Those documents argue that the operation altered international political dynamics in favour of Palestinian statehood — an assertion picked up and repeated by Hamas spokesmen and commentators.

Independent reporting and analyses likewise record Hamas officials taking direct credit for diplomatic effects following October 7. Open-source reporting (including contemporaneous coverage and later analytical pieces) documents statements by Gaza political leaders and political-bureau members characterising recognition and diplomatic shifts as among the “fruits” or political outcomes of the operation.

Taken together, these contemporaneous publications show that (a) Hamas publicly claimed a causal link between the Al-Aqsa Flood operation and later international recognition moves, and (b) those claims were expressed in language that treats recognition as a reward or political dividend of

the operation. Those public statements are admissible and highly probative evidence for the proposition that recognition may operate as an incentive to terrorist organisations and therefore can be pleaded as a relevant factual basis when arguing that recognition materially rewards violent activity.

65.4.5. These recognitions contravene binding human rights obligations:

ICCPR, Articles 6 and 7: the right to life and prohibition of torture and cruel, inhuman, or degrading treatment, violated by the targeting and abduction of civilians;

ICESCR, Articles 6–7: the right to work and just conditions, undermined by systematic attacks on civilian infrastructure;

HRA 1998, s.6: it is unlawful for public authorities in the UK to act incompatibly with Convention rights, and rewarding proscribed terrorist activity by recognition amounts to a breach of this statutory duty.

Supporting Extracts & Quotes

1. Ghazi Hamad, Hamas Political Bureau

In an interview with *Al Jazeera*, Hamad said:

“The initiative by several countries to recognize a Palestinian state is one of the fruits of October 7. We proved that victory over Israel is not impossible, and our weapons are a symbol of Palestinian dignity.”

<https://www.thejc.com/news/israel/hamas-claims-that-wests-recognition-of-palestinian-state-is-one-of-the-fruits-of-october-7-yntn65wr>

He also asked rhetorically:

“Why are all the countries recognizing a Palestinian state today? Before October 7, did any country dare recognize a Palestinian state?”

https://www.timesofisrael.com/liveblog_entry/hamas-leader-nations-are-recognizing-palestinian-state-due-to-fruits-of-october-7/

2. “Our Narrative... Operation Al-Aqsa Flood” Report (Hamas Media Office, January 2024)

The report states that Operation Al-Aqsa Flood was aimed at restoring national rights and “establish[ing] a Palestinian state with Jerusalem as its capital.”

<https://www.aa.com.tr/en/middle-east/hamas-releases-report-clarifying-operation-al-aqsa-flood/3115099>

The report also frames the operation as part of a strategy to shift international dynamics and force global attention:

“In light of the ongoing Israeli aggression ... our people continue their battle for independence, dignity and breaking-free from the longest-ever occupation ... We would like to clarify ... its motives ... its general context related to the Palestinian cause ... to put the facts into perspective.”

65.5. Gaza and Judea & Samaria: Status and Governance

65.5.1. Gaza:

- a. Israel never lawfully displaced a sovereign; Hamas seized power in 2007 via violent coup;
- b. Israel retained legal title; civil administration delegated to PA under Oslo Accords;
- c. Hamas governs by force, with no elections, judicial independence, or accountability;
- d. Under HRA 1998, ECHR, and ICCPR, Hamas cannot meet human rights obligations [(Montevideo parallel: effective government)].

65.5.2. Judea & Samaria (West Bank):

- a. Jordan's 1950 annexation unlawful; Israel acquired territory in defensive war 1967;
- b. Status is disputed, not occupied; sovereignty grounded in Mandate and *uti possidetis juris*.

65.5.3. Palestinian leadership has repeatedly rejected peace agreements (Peel 1937, UN Partition 1947, Camp David 2000, Taba 2001, Olmert 2008, Trump Plan 2020) and breached treaties (Oslo, Madrid, Camp David, Second Intifada), forfeiting any lawful claim to self-determination.

65.6. Human Rights Violations under HRA 1998 / ECHR 2003

65.6.1. Recognition violates:

- Article 2 (Right to life);
- Article 3 (Prohibition of torture/inhuman treatment);
- Article 5 (Liberty & security);
- Article 6 (Fair trial);
- Article 8 (Private & family life);
- Article 9 (Freedom of religion);
- Article 14 (Non-discrimination);
- Protocol No. 1 Article 1 (Property).

65.6.2. Violations are reinforced by ICCPR and ICESCR obligations to protect civil, political, and socio-economic rights.

65.6.3. Recognition materially increases the risk of antisemitic attacks and hostility in Ireland, the UK, and internationally, affecting safety of Jewish citizens, including the applicant.

65.7. State Accountability – UK/Irish Case Law

65.7.1. *Al-Jedda v UK* (ECtHR 2011) – UK responsible for extraterritorial detention.

65.7.2. *Belhaj & Rahmatullah v UK* (UKSC 2017) – immunity cannot shield complicity in torture.

65.7.3. *HM Treasury v Ahmed* [2010] UKSC 2 – ultra vires government acts unlawful.

65.7.4. *Secretary of State v Rahmatullah* (2012 UKSC 48) – extraterritorial acts justiciable.

65.8. Standing of the Applicant

65.8.1. As a citizen of Ireland and the United Kingdom, the applicant is entitled to challenge recognition of “Palestine” as repugnant to the Constitution of Ireland, ECHR Act 2003, and HRA 1998.

65.8.2. Recognition materially affects the safety, liberty, and security of civilians under terrorist and dictatorial regimes, as well as Jewish citizens, including the applicant.

65.8.3. Applicant has applied to Israel for *Alyiah*, right of return under article 4A of the law, thus is in a position to be even more directly impacted by the unsound and foolish recognition of Palestine.

65.9. Conclusion and Relief

65.9.1. Recognition of “Palestine” by Ireland and proposed UK recognition is:

- a. Ultra vires and void ab initio;
- b. Rewards genocide and terrorism;
- c. Denies lawful self-determination under governance respecting human rights;
- d. Constitutionally and legally impermissible (Ireland: Articles 29, 41.3.1°; UK: HRA 1998);
- e. Direct evidence of institutional bias affecting civilian populations.

65.9.2. Relief sought:

- a. Declaration that recognition is unconstitutional, ultra vires, and void ab initio;
- b. Suspension or reversal of recognition until lawful, treaty-based, democratic Palestinian state exists;
- c. Relief acknowledging violations of ICCPR, ICESCR, ECHR, HRA, and Irish constitutional duties;
- d. Any further relief deemed just by the Court.

65.10. Sources and Legal Instruments

65.10.1 International Covenant on Civil and Political Rights (ICCPR) – Establishes obligations for states to protect civil and political rights, including life, liberty, fair trial, and freedom from torture.

https://treaties.un.org/doc/treaties/1976/03/19760323%2006-17%20AM/ch_iv_04.pdf

65.10.2 International Covenant on Economic, Social and Cultural Rights (ICESCR) – Sets out rights to work, education, health, adequate standard of living, and cultural participation.

https://treaties.un.org/doc/treaties/1976/01/19760103%2009-57%20PM/ch_iv_03.pdf

65.10.3 Human Rights Act 1998 (UK) – Incorporates the European Convention on Human Rights into UK law, imposing duties on public authorities.

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

65.10.4 European Convention on Human Rights (ECHR) – International human rights treaty guaranteeing fundamental rights such as life, liberty, fair trial, and prohibition of torture.

https://www.echr.coe.int/documents/d/echr/convention_ENG

65.10.5 United Nations Charter – Establishes international law obligations, including maintaining peace, respect for sovereignty, and prohibition of acquisition of territory by force.

<https://www.un.org/en/about-us/un-charter/full-text>

65.10.6 Convention on the Prevention and Punishment of the Crime of Genocide – Defines genocide and imposes obligations on states to prevent and punish acts of genocide.

https://www.un.org/en/genocideprevention/documents/atrocities-crimes/Doc.1_Convention%20on%20the%20Prevention%20and%20Punishment%20of%20the%20Crime%20of%20Genocide.pdf

65.10.7 Montevideo Convention on the Rights and Duties of States (1933) – Outlines criteria for statehood; cited in brackets as a parallel to ICCPR, ICESCR, and HRA obligations on state responsibility and recognition of lawful governments.

<https://treaties.un.org/pages/showdetails.aspx?objid=0800000280166aef>

65.10.8 Global Demonstrations in Response to the Israel-Palestine Conflict – Provides direct evidence of public unrest and international objection, demonstrating the risks and instability generated by recognition of regimes controlling Gaza and the West Bank.

<https://acleddata.com/infographic/infographic-global-demonstrations-response-to-the-israel-palestine-conflict>

65.10.9 Antisemitic Attacks Since October 7, 2023 – Documents increase in attacks and bias, illustrating heightened risks to Jewish citizens, including those in Ireland and the UK.

<https://www.adl.org/resources/report/global-antisemitism-selected-incidents-2023>

65.11. Case Law Affirming Binding Obligations

65.11.1 United Kingdom

R (on the application of AAA) v. Secretary of State for the Home Department [2023] UKSC

27: The UK Supreme Court ruled that the government's policy of transferring asylum seekers to Rwanda was incompatible with the UK's obligations under Article 3 of the ECHR, which prohibits inhuman or degrading treatment. This decision underscores the UK's commitment to uphold ECHR rights domestically.

R (on the application of Public Law Project) v. Lord Chancellor [2016] UKSC 39: The

Supreme Court held that the Lord Chancellor's decision to reduce the scope of judicial review was incompatible with the constitutional principle of the rule of law, which is protected under the HRA. This case highlights the judiciary's role in ensuring that executive actions comply with human rights standards.

R (on the application of Miller) v. The Prime Minister [2019] UKSC 41: The Supreme Court found that the advice given by the Prime Minister to the Queen to prorogue Parliament was unconstitutional, emphasizing that actions by public authorities must comply with constitutional principles, including those enshrined in the HRA.

65.11.2 Ireland

Murphy v. Ireland [2014] IESC 19: The Irish Supreme Court ruled that the Director of Public Prosecutions' failure to provide reasons for issuing a certificate under Section 42(6) of the Offences Against the State Act 1939 was incompatible with the State's obligations under the ECHR. This case illustrates Ireland's commitment to aligning domestic law with international human rights standards.

European Convention on Human Rights Act 2003: This Act requires Irish courts to interpret domestic laws in a manner consistent with the ECHR. Section 2(1) mandates that Irish courts interpret statutory provisions in line with the State's obligations under the

Convention, and Section 4 requires courts to take account of judgments of the European Court of Human Rights.

A, B and C v. Ireland (2010) 53 EHRR 13: The European Court of Human Rights found that Ireland's abortion laws violated the ECHR, specifically Article 8, which protects the right to private and family life. This judgment compelled Ireland to amend its laws to comply with ECHR standards.

66. Provenance of Evidence

66.1 Statement of Uncontested Status:

All documents listed herein have been formally lodged in the courts specified, across both Ireland and the United Kingdom, and remain uncontested with respect to their authenticity, issuance, or source.

Their acceptance by multiple courts, including circuit, high, and appellate levels, establishes **presumptive authenticity and proper provenance**.

Once lodged in any jurisdiction, no court in the other jurisdiction has the authority to reinterpret, amend, or alter the document. Any attempt to do so is **ultra vires** and legally void.

66.2 Irish Passport

Issued by: Passport Office – Department of Foreign Affairs, Branch Office: 1st Floor, Crescent Quay, Wexford, Ireland.

Lodged: Court of Appeal (Ireland); Newcastle County Court, Family Division (United Kingdom).

66.3 Birth Certificate

Issued by: General Register Office, Branch Office: Civil Registration Service, Government Offices, Anne Street, Wexford, Ireland.

Lodged: Court of Appeal (Ireland); Newcastle County Court, Family Division (United Kingdom).

66.4 UK Driving Licence

Issued by: Driver and Vehicle Licensing Agency (DVLA), Longview Road, Morriston, Swansea SA6 7JL, United Kingdom.

Lodged: Court of Appeal (Ireland); Newcastle County Court, Family Division (United Kingdom).

66.5 High Court DNA Retention Orders (2001, 2001 & 2002)

Issued by: The High Court, Four Courts, Inns Quay, Dublin 7, Ireland.

Lodged: Kilkenny Circuit Court (Ireland); Nenagh Circuit Court (Ireland); High Court Dublin (Ireland); Court of Appeal (Ireland); Newcastle County Court, Family Division (United Kingdom).

66.6 Garda Custody Records

Originating Authority: Garda Síochána, Thomastown Garda Station, Thomastown, Co. Kilkenny, Ireland.

Forwarded via: Office of the Director of Public Prosecutions, Infirmity Road, Dublin 7, Ireland.

Lodged: Court of Appeal (Ireland); Circuit Court (Ireland); District Court (Ireland); Newcastle County Court, Family Division (United Kingdom).

66.7 2003 Warrant of Ireland

Issued by: District Court, Parliament Street Courthouse, Kilkenny, Ireland.

Forwarded via: Crown Prosecution Service (CPS), United Kingdom.

Lodged: Nuneaton Magistrates' Court; Westminster Magistrates' Court; London High Court; Newcastle County Court, Family Division; High Court Dublin; Kilkenny Circuit Court; Nenagh Circuit Court; Court of Appeal (Ireland).

66.8 2003 Summary of Evidence

Issued by: Nuneaton Magistrates' Court, Vicarage Street, Nuneaton CV11 4DR, United Kingdom.

Lodged: Nuneaton Magistrates' Court; Westminster Magistrates' Court; London High Court; Newcastle County Court, Family Division; High Court Dublin; Kilkenny Circuit Court; Nenagh Circuit Court; Court of Appeal (Ireland).

66.9 **2003 Warrant for Imprisonment**

Issued by: Nuneaton Magistrates' Court, Vicarage Street, Nuneaton CV11 4DR, United Kingdom.

Lodged: Nuneaton Magistrates' Court; Westminster Magistrates' Court; London High Court; Newcastle County Court, Family Division; High Court Dublin; Kilkenny Circuit Court; Nenagh Circuit Court; Court of Appeal (Ireland).

66.10 **2007 Conviction Certificate**

Issued by: Circuit Court, Courthouse, Parliament Street, Kilkenny, Ireland.

Lodged: Court of Appeal (Ireland, twice); Newcastle County Court, Family Division (United Kingdom); Tyne and Wear Magistrates' Court (United Kingdom).

Note: Tyne and Wear Magistrates' Court illegally interpreted this certificate as an endorsement (**ultra vires**).

66.11 **2007 Conviction and Sentence Certificate**

Issued by: Circuit Court, Tipperary, Ireland.

Disclosed by: Northumberland Police, Office of the Chief Constable, Middle Engine Lane Police Station, Wallsend, Tyne and Wear NE28 9NT, United Kingdom (2021).

Lodged: Court of Appeal (Ireland); Newcastle County Court, Family Division (United Kingdom); Tyne and Wear Magistrates' Court (United Kingdom).

Note: Tyne and Wear Magistrates' Court illegally interpreted this certificate as an endorsement (**ultra vires**).

66.12 **2008 European Arrest Warrant (EAW)**

Issued by: High Court, Four Courts, Inns Quay, Dublin 7, Ireland.

Forwarded via: Crown Prosecution Service (CPS), United Kingdom.

Lodged: Westminster Magistrates' Court; Newcastle County Court, Family Division; London High Court; Court of Appeal (Ireland); High Court Dublin.

66.13 **2009 Conviction and Sentence Certificate**

Issued by: Circuit Court, Nenagh Courthouse, Banba Square, Nenagh, Co. Tipperary, Ireland.

Lodged: Newcastle County Court, Family Division; Court of Appeal (Ireland, twice).

66.14 2009 Warrant for Imprisonment

Issued by: Circuit Court, Tipperary, Ireland.

Disclosed by: Northumberland Police, Office of the Chief Constable, Middle Engine Lane Police Station, Wallsend, Tyne and Wear NE28 9NT, United Kingdom (2021).

Lodged: Newcastle County Court, Family Division; Court of Appeal (Ireland).

66.15 2005 & 2006 Judgments

Issued by: Coventry County Court, The Combined Court Centre, Earl Street, Coventry CV1 2ND, United Kingdom.

Lodged: Newcastle County Court, Family Division.

66.16 2005/2006 CAFCASS Reports

Issued by: CAFCASS Coventry, Coventry District Office, The Quadrant, Coventry CV1 2DX, United Kingdom.

Filed: Newcastle County Court, Family Division; Coventry County Court, Family Division.

66.17 2008 Independent Children's Service (ICS)

Filed: Newcastle County Court, Family Division.

66.18 2008 and Later UK Police Reports

Filed: Newcastle County Court, Family Division.

66.19 Witness Statements

Ambrose Dunne: Lodged before Newcastle County Court, Family Division & Irish Court of Appeal; also before Coventry County Court, Family Division.

Johanna Dunne: Lodged before Newcastle County Court, Family Division & Irish Court of Appeal; also before Coventry County Court, Family Division.

Gan Choi Yeng: Lodged before Newcastle County Court, Family Division & Irish Court of Appeal.

Peter Ivan Dunne, Victim Impact Statement: Lodged before Newcastle County Court, Family Division & Irish Court of Appeal.

(All witness statements were provided to the applicant in person prior to lodgment.)

67. Statistical Improbability and Implied Deliberate Interference

Case Context:

This entry presents a statistical analysis of two separate, highly improbable sets of events connected to ongoing proceedings:

- 1. Repeated highly specific victim profiles across multiple countries.
- 2. Multiple warrants and court orders void on their face or void ab initio.

The purpose is to demonstrate that these patterns are effectively impossible under ordinary circumstances, supporting the inference of deliberate judicial manipulation or systemic interference.

67.1. Victim Profile Improbability

Primary child victim:

Age 10
Mentally impaired
Appears **four independent times**

Secondary adult victims:

Ages 18, 19, 20, 21
All mentally impaired

Additional factor:

Baby born in 2003 for alleged abuse in 2001

Countries: Ireland, Singapore, Thailand

Probabilistic Analysis

Factor	Probability	Notes
Child age 10	67.25%	1/16 of child population
Child mentally impaired	2.5%	WHO estimate
Child profile 4x	67.0e-12	1 in 166 billion
Adult age 18–21	5%	Per adult
Adult mentally impaired	2.5%	Per adult

Factor	Probability	Notes
Four adults per incident	2.44e-12	Independent assumption
Four adult incidents	3.55e-47	Extremely low
Combined child + adults, single incident	3.81e-15	~1 in 262 trillion
Combined 4 incidents	2.1e-58	Effectively zero

Interpretation:

The likelihood of the same highly specific victim profile occurring across four independent incidents in three countries — including multiple mentally impaired adults — is effectively zero. When combined with **temporal inconsistencies** (e.g., a baby born in 2003 for abuse in 2001), these events are **statistically impossible under normal circumstances**.

67.2. Improbability of Multiple Void Warrants and Court Orders by Coincidence

Documents involved:

- 5 warrants void on their face
- 5 court orders void on their face
- 4 court orders void ab initio
- Total: 14 documents from 4 tainted hearings across 2 countries

Estimated probabilities (per document):

- Warrant or order void on face: 1 in 10,000 (10^{-4})
- Order void ab initio: 1 in 100,000 (10^{-5})

Probabilistic Analysis

Document Type	Number	Estimated probability per document	Probability for all
Warrants void on face	5	1e-4	1e-20
Court orders void on face	5	1e-4	1e-20
Court orders void ab initio	4	1e-5	1e-20
Combined probability	14	—	1e-60

Interpretation:

The chance that 14 independent documents across multiple hearings and countries would all be void on their face or void ab initio by coincidence is effectively zero. This strongly indicates deliberate interference or coordinated judicial manipulation.

67.3. Combined Analysis and Conclusion

Both the victim profile pattern and the void documents individually have probabilities approaching zero. Combined, they present a pattern of events that cannot occur by chance.

Implication:

These events are only explainable statistically through deliberate, systematic interference, coverup, or planned containment by judicial authorities or other actors.

The improbability serves as strong evidentiary support in legal filings to demonstrate procedural irregularities, misconduct, or abuse of process.

Supporting Notes:

Calculations assume independent probabilities; actual dependence would only make the observed pattern more improbable.

Temporal inconsistencies and cross-border replication further reinforce the impossibility of coincidence.

68. Career and Technology

Techoverview.pdf, resume.pdf

68.1 Engineering and Technical Background (Implemented / Demonstrated)

The applicant's resume shows expertise in an **unusually broad scope**, demonstrating skill equivalence to multiple Masters and Doctorates across distinct disciplines. This includes:

Electrical, electronic, and mechanical systems design and implementation.

Advanced thermodynamics and fluid systems, including high-efficiency compressors and HVAC engineering.

Novel continuous burn engines (one a variant of a turbojet, the other the world's only positive displacement CBE).

High-efficiency power electronics, including AC-to-DC conversion topologies.

Systems integration combining electronics, mechanical engineering, and environmental control.

The breadth and depth of skill displayed is highly unusual, let alone for an individual with no demonstrable academic or industrial training.

68.2 Gaming System (Implemented by 2003) (Implemented / Commercialization Ready)

System Overview:

- Full functional gaming system operational by 2003, designed for imminent commercialization.
- Multi-platform support, networked gameplay, and real-time data synchronization.
- Highly scalable architecture capable of supporting millions of simultaneous players.
- Supports both high-value and low-value game formats, demonstrating versatility in market targeting.

High-Value Hourly Game:

- Designed for 1,500,000 players per game, with 24 games per day, resulting in 36,000,000 plays daily.
- Bet per play: £5.00
- Daily Total Bets: £180,000,000 (before payouts)
- Bet Breakdown:
 - Jackpot 68%: £122,400,000/day, £856,800,000/week
 - Bonus payouts 2%: £3,600,000/day, £25,200,000/week
 - House 30%: £54,000,000/day, £378,000,000/week

Low-Value Quick Games:

- Designed for smaller groups (~1,000 players) with rapid turnover, continuous play, and low entry bets (e.g., £0.50).
- Multiple games can start simultaneously as soon as player thresholds are met, potentially hundreds per hour.
- Provides robust secondary revenue stream and demonstrates system capability for massive concurrency management.
- Bonus structures allow for micro-jackpots and dynamic payouts proportional to participation and bet amounts.

Annual System Capacity (Financial Estimate):

- Total annual potential revenue: £19,656,000,000
- Even at 1% of full system capability: £196,560,000 (robust, conservative estimate for court context)
- This illustrates that even minimal exploitation of the system equates to damages in the billions of pounds, highlighting extreme commercial value and financial impact.

Technical Capabilities:

- Multi-tiered game design enables dynamic scaling for both high-stakes and low-stakes player pools.
- Robust load balancing, concurrency handling, and modular architecture ensure resilience under extreme player loads.
- Real-time financial tracking and payout automation across diverse game types.

Significance:

- System demonstrates high-level applied programming, systems design, and financial sophistication.
- Uniquely scalable: capable of serving millions of players in both high-value and low-value markets.
- Remains cutting-edge even 22 years later, demonstrating both technical and commercial foresight.

68.3 Electronics and Power Systems (Implemented / Demonstrated / Ongoing Research)**System Overview:**

- Advanced circuit design and embedded electronics development across mechanical, thermal, and software-integrated systems.
- Expertise spans analog, digital, and power electronics, including automation and signal processing.
- Demonstrated ability to rapidly prototype and integrate electronics with multi-disciplinary systems such as HVAC, AWG, and industrial machinery.

Invariant AC-to-DC Converter Topology (Ongoing Research):

- Developed a unique AC-to-DC power conversion topology capable of maintaining excellent power factor and efficiency with minimal component count.
- Design employs a single transformer driven by two primary-side MOSFET transistors, achieving simplicity and reliability unmatched in conventional designs.
- Preliminary tests indicate that further development will realize a power factor above 0.95 with efficiencies of 95% or better upon completion.

Other Electronics Development:

- Custom sensors, signal processing, and control systems for multi-domain integration.
- Embedded microcontroller solutions for automation and system monitoring.

- Electronics integration with mechanical systems (compressors, fluid systems, environmental control).

Significance:

- Demonstrates technical sophistication equivalent to advanced industrial or doctoral-level power electronics research, achieved without formal academic or industrial training.
- Despite all abuse and trauma the applicant has been subjected to, he continues to develop world-class devices.

68.4 Advanced Mechanical & Thermodynamic Systems (Multiple Implemented / Demonstrated, some conceptual)

System Overview:

- Pioneering expertise in hybrid, Atmospheric Water Generation (AWG), and HVAC systems as the senior engineer working alongside a team of scientists.
- Co-invented and developed multiple devices, including novel compressors and microtube heat exchanger methods.
- Invented energy-recovering expansion control systems for high-efficiency thermodynamic cycles.

Compressor and Engine Innovations:

- Invented two distinct compressors, plus principal co-inventor on three additional compressor designs.
- Gas turbine engine: unique axial inflow, radial outflow, multi-stage compressor configuration.
- Positive displacement rotary continuous burn engine: incorporates proprietary compressor and expander inventions, demonstrated exceptional performance.
- Membrane pump: conceptual and plausible development for blood and other biofluid applications, demonstrating cross-domain innovation.

Air and Environmental Systems:

- Advanced AWG, Air Conditioner hybrid systems integrating thermodynamics and fluid management for high output with minimal energy input.
- Optimized weight, storage, and power efficiency across environmental conditions.

Significance:

- Demonstrates world-leading mechanical and thermodynamic engineering capability,

equivalent to multiple Masters- and Doctorate-level achievements.

- Systems remain highly innovative and relevant decades after initial conception.
- Applicant continues to invent and refine devices of global significance despite extraordinary personal adversity.

68.5 Multi-Modal Biosensor for Water Quality Monitoring (Conceptual, viability studies completed)

Purpose and Overview:

- Designed for integration with AWG-AC hybrid systems to monitor ultra-pure and distilled water for airborne and biological contamination.
- Developed by the applicant during leadership of advanced HVAC and AWG systems in Singapore.
- Addresses a critical need for real-time, non-invasive water quality monitoring with potential global health and environmental impact.

Core Sensing Methods:

- Optical Microscopy & Image Recognition: Custom optics with COTS cameras enable micro-scale particle detection; classified using proprietary pattern recognition algorithms.
- Spectral Analysis (UV & White Light): UV biofluorescence highlights bacterial/algal content; white light absorption profiling characterizes dissolved organic/inorganic material.
- Electrochemical Probing: Gold-plated PCB contacts detect conductivity and dielectric shifts, flagging ionic or particulate contamination.
- Gas/Vapor Sensing: Identifies volatile organic compounds or microbial metabolic gases.

Intelligent Contaminant Identification:

- Multi-sensor fusion cross-validates outputs from all modalities to improve contaminant classification.
- Real-time confidence scoring with digital sample retention and optional physical sampling for laboratory analysis.
- Automated alerts issued when readings fall below critical identification thresholds.

Development Status:

- While several elements are unique, the applicant takes a pragmatic approach, leveraging existing technologies combined with novel components to create solutions far greater than the sum of their parts.

- This approach mirrors the applicant's software developments in data and linguistic systems.

Significance:

- Demonstrates multi-disciplinary expertise integrating optics, microfluidics, spectroscopy, electronics, embedded systems, and AI-based pattern recognition.
- Provides early-stage prototype for real-time water quality monitoring, suitable for environmental, industrial, public health, and biofluid diagnostic applications.
- Despite extensive personal adversity and trauma, the applicant continues to develop world-class systems of global relevance.
- Illustrates exceptional systems-level thinking and integration, broadly comparable to advanced research at Master's and Doctorate levels across multiple interrelated disciplines.

68.6 NLSO & Classified Advertising Platform (Implemented / Conceptual, Live Testing 2008)

Overview:

- Developed the Jazenga classified advertising platform utilizing the applicant's Natural Language Support Objects (NLSO) framework.
- Fully multilingual classified advertising portal built on the Gameplan concept derived from Convergent Technologies research proposals.
- Designed to feed structured product, image, and linguistic data into AI training systems, without incorporating AI itself.
- Cooperative data systems built for product and service data integration, enabling applications beyond traditional classifieds.
- Platform was live in testing by 2008, moving toward full commercial operation.

Technical Innovation:

- Inherent multilingual support: translation interface fully integrated into the platform; no external translation tools required.
- Data pipeline design: structured to enable extensive product and service data reuse for user convenience and generation of high-value structured data for use in other products and services.
- System-level integration: combines software, data, and language modules into a seamless, real-time operational environment.

Significance:

- Demonstrates the applicant's ability to develop globally scalable, multi-lingual data systems years ahead of mainstream commercial platforms.
- Exemplifies systems-level thinking, integrating linguistic, software, and data processing innovations into a single unified platform.
- Highlights capability to create infrastructure to support AI training and cooperative distributed applications, a capability rarely achieved outside of top-tier research institutions.

68.7 Polylingual Ontologies – AILOKS (Implemented / Conceptual)**Overview:**

Developed AILOKS (Advanced Interlingual Linguistic Ontology Knowledge System), a polylingual ontology framework enabling structured representation of concepts, relationships, and language constructs across multiple languages.

Preliminary research focused on machine translation using structured linguistic data, years ahead of similar methodologies now emerging with Large Language Models (LLMs).

Designed to support multi-language interoperability, semantic alignment, and cross-linguistic reasoning without reliance on statistical AI methods.

Technical Innovation:

Structured linguistic frameworks capture context, meaning, and syntactic relationships across languages, enabling high-fidelity translation pipelines.

Data-centric approach allows AI training systems to consume structured language and concept data efficiently, supporting downstream applications in translation, classification, and natural language understanding.

Interoperable ontology modules integrate with software, data pipelines, and web platforms such as Jazenga and Gameplan.

Non-linguistic parameter bridging: Introduced the concept of bridging languages using non-linguistic parameters, such as imagery, tactile information, and actions, to enhance semantic alignment across languages.

Significance:

Demonstrates expertise in linguistics, software design, and systems-level integration, anticipating concepts that underpin modern LLMs by over a decade.

Exemplifies the applicant's ability to create foundational structures for multilingual AI training environments, an area still rare and advanced even today.

Highlights the capacity to design scalable, modular, and future-proof linguistic systems, with applications ranging from translation to global data aggregation and cross-domain semantic reasoning.

68.8 Convergent Technologies Research Framework (Conceptual / Implemented Proposals)

Overview:

Developed as a holistic research and design methodology, integrating multiple domains including gaming, linguistics, AI training pipelines, distributed computing, cybersecurity, and cooperative business systems.

Served as the conceptual backbone for numerous implemented projects — such as the 2003 commercial-ready gaming system, NLSO/LSF frameworks, Jazenga, and AILOKS — while also framing proposals for advanced cybersecurity (GRINDS) and peer-to-peer platforms (GUAN-XI, PeerSafe, GDA).

Unified under the Gameplan methodology, enabling modular, cross-domain system integration and reuse of structured data for business, communication, and security applications.

Technical Innovation:

Cross-domain convergence: Applied common design principles to diverse fields — electronics, linguistics, AI data systems, and mechanical/environmental systems — producing solutions greater than the sum of their parts.

System-of-systems approach: Anticipated later technological integrations seen in IoT, cloud ecosystems, LLMs, and AI-driven cybersecurity, but designed and in many cases implemented more than a decade earlier.

Scalable, distributed architectures: Conceptualized peer-to-peer data, computation, and backup systems well before blockchain or decentralized networks gained traction.

Significance:

Establishes the applicant's visionary capability to anticipate and operationalize convergence across technical, linguistic, and commercial domains.

Demonstrates a consistent ability to design globally scalable systems, many of which remain unmatched in integration and foresight.

Provides the intellectual framework connecting implemented projects with forward-looking proposals, showing continuity between theoretical research and practical, commercially viable systems.

68.9 Expertise Summary and Probabilistic Analysis of Legal Context

68.9.1 Technical Expertise

The applicant's record demonstrates expertise across multiple domains at a level broadly equivalent to several Masters and multiple Doctorates in distinct but interconnected disciplines. This level of skill is exceptionally rare even within academia and advanced research institutions. It is inconsistent with any known conventional educational or career development path, particularly for an individual self-employed without access to institutional resources.

Markers of advanced and integrated technical education were already clearly established by the time the applicant arrived in the UK in 1997. The breadth of expertise spans:

Linguistics and Computation: Design of Natural Language Support Objects (NLSO), polylingual ontologies (AIOKS), and translation frameworks with conceptual parity to modern LLMs, developed more than a decade earlier.

Gaming Systems: Fully implemented, commercial-ready, large-scale multiplayer system operational by 2003, with conservative financial valuation in the billions, unmatched by contemporaneous commercial deployments.

Business and Data Systems: Jazenga classified advertising system, Gameplan Integrated Business Solutions (GIBS), and data pipelines designed for structured reuse and AI training integration.

Mechanical and Thermodynamic Systems: Compressors (co-invented 3, personally invented 2), hybrid AWG-HVAC systems, atmospheric water generation, energy-recovering expansion controls, and biofluid-capable membrane pumps.

Electronics and Power Systems: Invariant topology AC–DC conversion research (preliminary testing achieving >95% efficiency and >0.95 power factor projected), high-voltage PSFB and LLC power systems.

Cybersecurity and Distributed Systems: GRINDS network defence, GUAN-XI peer-to-peer social networking, and resilient distributed data hosting.

The cost in time and resources required to acquire and integrate this scope of knowledge would be prohibitive for any self-directed engineer. The only logical conclusion is that the applicant has, at

some stage, had access to advanced, off-book training consistent with covert operations and specialist research, not consistent with criminal or terrorist organisations.

68.9.2 Legal Context and Probabilistic Analysis

When these technical markers are considered alongside the unprecedented catalogue of legal and procedural failures since 2003, it becomes clear that none of the prosecutions or legal actions had any genuine foundation in law. Instead, the pattern of legal actions is consistent with measures intended to contain, compromise, and ultimately destroy an individual of extraordinary inventive capacity, wrongly deemed a security risk.

On probability, the applicant was misclassified by both Ireland and the UK as a “ghost asset” of unknown affiliation. While there is a reasonable prospect applicant was erroneously assessed as a Mossad asset due to Jewish identity, for the record, the applicant never had the honour of working with Mossad. I affirm unequivocally that I have never been formally engaged by any agency and has consistently opposed terrorist activity since first approached.

68.9.3 Significance and Recognition

The court is invited to recognise the applicant’s standing as one of Britain and Ireland’s most resilient and creative inventors, wrongly suppressed due to false security classifications and miscarriage of justice. His capabilities, achievements, and sustained resilience despite abuse and trauma underscore the exceptional strategic and technical value of his work, and the non-standard pathways by which these skills were developed.

69. Joint Obligation to Restore the Applicant, and of Principally Affected Persons to Full Compensation

69.1 Irish Constitutional and Legal Basis

69.1.1 Positive Duty to Protect and Restore

Article 41.3.1 of the Irish Constitution obliges the State to "respect, and, as far as practicable, by its laws to defend and vindicate the personal rights of the citizen."

The State (Healy) v Donoghue [1976] IR 325, requiring proactive protection of rights, especially for unrepresented or disadvantaged individuals.

M v The Attorney General [1979] IR 73, affirming vindication extends beyond compensation to restoring liberty, dignity, and good name.

McGee v Attorney General [1974] IR 284, declaring personal rights under Article 41.3 real, enforceable, and substantive.

Damache v Minister for Justice [2012] IESC 14, holding that procedural compliance cannot excuse constitutional breaches.

Courts have interpreted this as extending beyond the principal applicant to persons whose fundamental rights are directly affected by state action or inaction, including family members (Ryan v Attorney General [1965] IR 294).

Application to Family Members: The unlawful actions against the applicant—detention, restriction of liberties, interference with commercial activity, and family disruption—directly and foreseeably harmed:

- Spouse: loss of marital support
- Children: loss of parental care and financial provision
- Former fiancée and close associates: loss of companionship, guidance, and economic opportunity

Therefore, the State has a constitutional obligation to restore all those directly affected to their rightful position, in line with Article 41.3.1.

69.2 English Law and Common Law Principles

69.2.1 Duty of Restitution to Third Parties

Under English law, victims of consequential harm caused by unlawful acts may recover damages if the harm was reasonably foreseeable (Donoghue v. Stevenson [1932] AC 562).

Application: Family members and associates suffered direct, foreseeable harm as a result of unlawful detention, extradition-related actions, and interference with commercial and professional activities of the applicant. This includes financial loss, reputational damage, and emotional distress.

69.2.2 Joint Liability of States

When two or more states jointly contribute to harm—e.g., Ireland violating constitutional rights and UK authorities enforcing or relying on those violations—joint liability extends to all affected parties, not just the principal applicant.

Precedent: *R v Secretary of State for the Home Department, ex parte Doody* [1994] 1 AC 531 supports the principle that harms caused by administrative decisions must account for all foreseeable impacts, including on third parties.

69.3 Extradition, Mutual Assistance, and Shared Harm

Cases such as *United States v. Rauscher*, 119 U.S. 407 (1886), *Canada v. Schmidt*, [1987] 1 S.C.R. 500, and *Charlton v. Kelly*, 229 U.S. 447 (1913) demonstrate that where states cooperate in extradition or cross-border enforcement, both bear joint responsibility for the resulting harms, including to persons directly affected by the principal applicant's detention or legal challenges.

Principle: If the harm was directly foreseeable to the cooperating states, all materially affected persons are entitled to restitution or compensation proportional to their losses.

69.4 Application to Principally Affected Parties

69.4.1 Spouse (Gan Choi Yeng): Loss of marital companionship, financial support, and opportunity to benefit from the applicant's inventions and commercial ventures.

69.4.2 Children (Son and Daughter): Loss of parental care, guidance, and economic inheritance arising from the applicant's unrealized commercial potential.

69.4.3 Former Fiancée (Wendy Dixon) and Close Associates (Urszula Domek): Loss of companionship, emotional support, and indirect financial losses arising from the applicant's detention and restrictions.

All are jointly entitled to full compensation, reflecting:

- The magnitude of harm sustained
- The foreseeability of the harm caused by unlawful acts
- The shared obligation of both states to restore rights and compensate damages

69.5 Conclusion

Under Irish constitutional law, English common law, and principles of joint liability, the damages owed to the principal applicant cannot be separated from the losses suffered by those materially affected.

Therefore, the State(s) must ensure full compensation for all principally affected parties, proportionate to the losses, including:

- Emotional and psychological harm
- Loss of familial support and guidance
- Loss of financial and commercial opportunity
- Loss of reputational standing

The joint responsibility of Ireland and the UK extends fully to all affected parties, ensuring restoration to the position they would have occupied had the violations not occurred.

70. Extradition Framework Violates Human Rights

70.1 Introduction

The extraditions of 2003 and 2008/2009, executed under the Warrants Act and Extradition Acts, including enforcement of European Arrest Warrants (EAWs), so egregiously violate fundamental human rights that the entire extradition framework must be declared incompatible with statutory and constitutional protections.

Under the ECHR Act 2003 (implementing the European Convention on Human Rights into domestic law) and HRA 1998, these statutes currently fail to protect defendants' rights under Articles 2, 3, 5, 6, 8, and 9, leaving individuals exposed to arbitrary and irreversible violations.

70.2 Non-Derogable and Qualified Rights

70.2.1 Non-Derogable Rights

Articles 2, 3, 5, and 6 are non-derogable rights:

- Article 2 – Right to life
- Article 3 – Prohibition of torture and inhuman or degrading treatment
- Article 5 – Right to liberty and security
- Article 6 – Right to a fair trial

These rights cannot be suspended under any circumstances. Extradition orders issued without notice, without service, relying on fabricated evidence, and coercing consent for police records constitute direct violations of non-derogable rights.

70.2.2 Qualified Rights

Articles 8 and 9 are qualified rights:

- Article 8 – Right to respect for private and family life
- Article 9 – Freedom of thought, conscience, and religion

Interference with qualified rights is strictly limited and must be necessary, proportionate, and lawful. In these cases:

- Article 8 rights were wholly and permanently negated—contact with family was severed, and no lawful remedy or recourse is now possible at all.
- Article 9 rights were wholly disregarded, subordinated to administrative expediency without justification.

70.3 Egregious Violations Demonstrated

70.3.1 Denial of Fair Trial and Due Process

Extraditions executed without proper service, notification, or opportunity to challenge allegations (Articles 6 and 5).

Reliance on fabricated evidence (non-existent victims) and coercion for consent (Articles 6 and 3).

70.3.2 Exposure to Inhuman Treatment and Arbitrary Detention

Risk of detention under defective warrants without oversight violates Articles 3 and 5.

70.3.3 Permanent Destruction of Family and Personal Rights

Contact with children severed; Article 8 rights entirely breached without lawful justification.

Personal autonomy and freedom of conscience infringed; Article 9 rights compromised.

70.4 Legal Basis for Injunction and Reform

70.4.1 Under the Warrants Act and Extradition Acts

Enforcement relies on defective warrants and fails to incorporate safeguards mandated by HRA 1998 and ECHR 2003.

Defendants are left without enforceable remedies, including recall or return in cases of rights violations.

70.4.2 Court Must Declare Framework Incompatible

The wholesale violations of non-derogable rights (Articles 2, 3, 5, 6) and permanent breach of qualified rights (Articles 8, 9) render the framework incompatible with the rule of law and statutory obligations.

70.4.3 Relief Sought

Immediate injunction against all extradition actions to or from the UK and Ireland until the laws are rewritten with:

- Proper guarantees and safeguards for non-derogable and qualified rights
- Full ability to challenge legality in either jurisdiction
- Enforceable recall/return of prisoners where violations are found

Courts in either nation must have authority to overturn defective extradition orders for speciality violations or rights breaches.

70.5 Conclusion

The current legal framework for extradition, as applied in 2003 and 2008/09, constitutes a systemic, wholesale negation of human rights:

- Non-derogable rights (Articles 2, 3, 5, 6) completely violated
- Qualified rights (Articles 8, 9) permanently and irreparably breached

Consequently, the courts must:

1. Declare the framework incompatible with HRA 1998 and ECHR 2003
2. Suspend all extraditions until the law provides effective, enforceable safeguards

Any continuation of the current regime perpetuates arbitrary detention, denial of fair trial, and destruction of family and personal rights.

71. Procedural and Substantive Defects: Inordinate Delay, Continuing Questioning, Invocation of Rights, Criminal Complaint, and Abuse of Power

ongoing_risk.pdf

71.1 Inordinate Delay

The summons (Case No. **2025/147632**) was applied for by Garda **John Costello** on behalf of the DPP at Ennis District Court on **21 February 2025**.

It was not issued until **01 September 2025**, a delay of over six months.

This delay is unexplained and prejudicial, contrary to the requirement that criminal proceedings be initiated without undue delay (*McFarlane v. DPP* [2010] 4 IR 702).

71.2 Continuing Questioning After Summons Application

- The summons (Case No. 2025/147632) was applied for by Garda John Costello on behalf of the DPP at Ennis District Court on 21 February 2025.
- Despite this, Gardaí continued questioning and correspondence with the Accused well after that date, including after the issuance of the summons. These included:
 1. 11/06/2025 – Email from Clerical Officer Catherine Hogan (on behalf of Detective Inspector David Finnerty, CT Divisional Protective Services Unit), requesting confirmation of current address and contact details.
 - This was over four months after the summons application, and constitutes direct questioning and procedural contact.
 2. 12/06/2025 – Email from the Accused to Gardaí, responding and asserting rights, which generated further Garda response.
 3. 13/06/2025 – Email from Detective Inspector David Finnerty, acknowledging receipt of the Accused's communications and demanding confirmation of identity, continuing engagement and questioning.
 4. 14/06/2025 – Email from the Accused formally lodging a criminal complaint against Garda John Costello, citing Garda correspondence and actions.

- This was followed by Gardaí responses that continued the procedural engagement.
5. 16/06/2025 – Email correspondence with Gardaí regarding the complaint, demands for disclosure, and further clarification of rights and obligations.
 6. 26/08/2025 – Additional Garda correspondence regarding the matter, specifically raising further demands relating to address notification and compliance, despite the ongoing proceedings and summons process.
- All of the above occurred after the summons application (21 February 2025) and demonstrate continuing procedural contact and questioning by Garda officers.
 - This is in breach of procedural fairness, as the continuation of questioning after the initiation of formal proceedings engages Article 6 rights (DPP v. Gormley & White [2014] IESC 17; Salduz v. Turkey, App No. 36391/02, ECHR 2008).
 - Such conduct undermines the integrity of the summons process and further evidences prosecutorial overreach and procedural irregularity.

71.3 Invocation of Rights and Formal Notice Given

- The Accused repeatedly invoked rights both by WhatsApp and email:
 - 28/08/2024 16:30 – “Pursuant to Schedule 1 Article 6 appoint a solicitor for me.”
 - 28/08/2024 16:44 – Formal notice to Garda Costello: his actions violated Article 6 ECHR and the rule of speciality under s.39 Extradition Act 1966.
 - 28/08/2024 16:50 & 17:47 – Written demands for solicitor details, reasons of arrest, and Garda identity.

- 02/09/2024 09:18 – Email to Finnerty and Hogan: re-assertion of Article 6 right to counsel; objection to continued contact absent solicitor.
- 09/09/2024 15:06 – Email to Clare Gardaí reiterating the notice of violations of rights and refusal to engage further without legal representation.
- These invocations put Gardaí on express notice of violations. Despite this, questioning and correspondence continued, contrary to Gormley & White and Salduz.

71.4 Criminal Complaint Against Garda Costello

- On 14/06/2025, the Accused filed a complaint with Detective Inspector David Finnerty (Clare T Divisional Protective Services Unit), reference CDPSU_26-358495/24.
- Allegations included:
 - Malfeasance in public office.
 - Acting ultra vires without lawful basis.
 - Perverting the course of justice through non-disclosure and denial of counsel.
- This complaint remains unresolved and directly undermines the integrity of the present summons.

71.5 Abuse of Power – Misuse of Children’s Act Reference

On 21/08/2024 09:33, Garda Costello claimed “duties in relation to child protection under the Children’s Act” as justification for pursuing the Accused’s address.

The Children Act 2001 concerns youth justice, and the Children First Act 2015 covers mandatory reporting of child harm. Neither creates an obligation in relation to address-notification under the Sex Offenders Act 2001.

Even if the Accused had stayed temporarily with his sister and her 15-year-old daughter, this could not activate duties under the Children's Act absent specific evidence of risk.

The reference was therefore:

Irrelevant and improper;

Ultra vires statutory powers;

Intimidatory, intended to compel compliance by threat of child-protection intervention.

Such conduct amounts to abuse of power and unlawful interference with family life under **Article 8 ECHR** (*Gillan & Quinton v. UK* App No. 4158/05, ECHR 2010).

72. Divorce as Remedy in Context of State-Engineered Marital Destruction

72.1 Statutory Framework

72.1.1 Irish Law – Family Law (Divorce) Act 1996

- Section 5(1) permits divorce where spouses have lived apart for at least two of the previous three years, there is no reasonable prospect of reconciliation, and proper provision has been made for spouses and dependants.

72.1.2 English Law – Matrimonial Causes Act 1973

- Section 1(2)(b) permits divorce on the ground of “unreasonable behaviour,” where the petitioner cannot reasonably be expected to live with the respondent.

72.1.3 Limitation

- Neither statute provides for State-engineered catastrophic breakdown of marriage.
- In such circumstances, the separation period and normal statutory criteria must yield to constitutional and Convention duties of the States to restore, vindicate, and compensate.

72.2 Engineered and Forced Separation

72.2.1 Separation is not voluntary or constructive desertion. It has been caused directly by actions of the States of Ireland and the United Kingdom, through judicial misconduct, police intimidation, and transnational interference. These acts permanently destroyed the marriage.

72.2.2 The doctrine of unclean hands applies: the States cannot rely on statutory separation thresholds that they themselves engineered.

72.2.3 The statutory separation period is inapplicable because the courts will no longer have the ability to hear this matter following the termination of this court proceeding; adjournment alone will not preserve jurisdiction.

72.3 No Reasonable Prospect of Reconciliation

72.3.1 The applicant seeks permanent refuge in Israel. Malaysia is not a reasonable option due to:

- Anti-Zionist restrictions and risks arising from the applicant being Jewish and vocally Zionist.
- Malaysia has no diplomatic relations with Israel.
- Malaysian passports explicitly prohibit travel to Israel; entry for Israeli citizens requires prior written approval and is granted only in exceptional cases.

72.3.2 The wife and daughter remain in Malaysia, where relocation to Israel would cause catastrophic loss of familial, social, and cultural connections.

72.3.3 As a result, reconciliation is impossible due to State-engineered circumstances and international legal restrictions.

72.3.4 The criteria of:

- Section 5(1)(b) Family Law (Divorce) Act 1996 (“no reasonable prospect of reconciliation”), and
- Section 1(2)(b) Matrimonial Causes Act 1973 (“unreasonable behaviour”), are fully met by the actions of the States of Ireland and the United Kingdom, which rendered the marriage incapable of subsistence.

72.4 Dual Citizenship Alternative and Family Restoration

72.4.1 In recognition of the State-engineered harm and extraordinary circumstances:

- The United Kingdom is invited to grant British citizenship to the applicant's wife on the basis that, under ordinary circumstances, she would have been eligible for naturalisation and citizenship. This grant is conditioned only upon acceptance and follows the precedent of extraordinary citizenship grants to the applicant.
- The Irish Government is invited to grant Irish citizenship to the applicant's children on the basis that Ireland cannot provide British citizenship; under its duty to restore rights and compensate, Irish citizenship represents the closest analog available to secure their legal and social status.
- The grant of citizenship to the wife and children ensures practical legal recognition and restoration of rights disrupted by State-engineered actions.
- This dual nationality arrangement would allow the family to travel strategically: arriving in Israel on British passports and traveling to Malaysia on Irish passports, providing an alternative means to preserve family unity despite international restrictions.

72.4.2 Effect on Compensation

- The citizenship grants, and the resulting capacity for the family to remain together, materially affect the calculation and scope of compensation, particularly in respect of the applicant's wife & daughter, whose loss and disruption were caused by the deliberate actions of the States.

72.4.3 Proper Provision and Financial Redress

- The applicant cannot provide financial support due to total incapacitation caused by the States.
- The States of Ireland and the United Kingdom bear the duty to provide compensatory redress to:
 - The applicant,

- His wife, and
 - Their daughter.
- Compensation must be commensurable with statutory “proper provision” standards and sufficient to restore the parties to the position they would have held absent the State-engineered destruction. This includes whole-life loss of family as set out in the financial redress package cited in Item 71:
 - Daughter – loss of father: £75,000,000
 - Wife, Gan Choi Yeng – loss of spouse: £75,000,000

72.5 Duty to Restore and Vindicate Rights

72.5.1 Irish Constitutional Duty

- Article 41.3.1 obliges the State to respect, defend, and vindicate the personal rights of the citizen.
- Precedent: *The State (Healy) v Donoghue* [1976] IR 325; *M v Attorney General* [1979] IR 73; *McGee v Attorney General* [1974] IR 284; *Damache v Minister for Justice* [2012] IESC 14.
- Application: The State is obliged to restore marital and familial rights, including financial and personal restitution, for the applicant, spouse, and child.

72.5.2 English Law and Common Law Principles

- Victims of consequential harm caused by unlawful acts may recover damages if harm was reasonably foreseeable (*Donoghue v Stevenson* [1932] AC 562).
- Joint liability applies where two or more states contribute to the harm.
- Precedent: *R v Secretary of State for the Home Department, ex parte Doody* [1994] 1 AC 532.

72.5.3 ECHR Duties

- Articles 6 and 8 protect fair hearing and family life.
 - Permanent destruction of the marriage, contact severance, and forced separation constitute violations.
-

72.6 Relief Sought

72.6.1 Grant a decree of divorce under both Irish and English law.

72.6.2 Disapply statutory separation thresholds due to unclean hands and State-engineered destruction.

72.6.3 Order the States of Ireland and the United Kingdom to provide:

- Full financial compensation to applicant, wife, and daughter, sufficient to meet “proper provision” standards, including whole-life family losses as detailed in Item 68.8.
- Reparative measures reflecting loss of familial, social, and economic rights.

72.6.4 Recognise in law that the marriage has been irretrievably destroyed by State conduct, not by the parties themselves.

72.6.5 Establish the divorce as a predicate for restitution and repair of fundamental rights, in accordance with constitutional and Convention obligations.

72.6.6 Dual Nationality Alternative and Family Restoration

- Direct or invite the United Kingdom to grant British citizenship to the applicant’s wife, in recognition of her disrupted eligibility for naturalisation caused by State-engineered harm.
- Direct or invite the Irish Government to grant Irish citizenship to the applicant’s children as a compensatory measure where British citizenship is unavailable, securing their legal and

social status.

- Recognise that such dual nationality arrangements are a necessary remedial measure to preserve family unity, ensure freedom of movement, and mitigate the consequences of State-engineered destruction.
- Confirm that the provision of dual nationality materially affects the scope of compensation owed, particularly to the applicant's wife and daughter, whose family life and rights were disrupted by the unlawful acts of the States.

73. Relief Sought

Principal Applicant: Peter Ivan Dunne

The applicant respectfully seeks the following relief:

73.1 Declarations of Ultra Vires, Void Ab Initio Warrants and Charging Instruments

73.1.1 Declaration that all warrants issued in respect of the applicant are ultra vires, void ab initio.

73.1.2 Declaration that all charging instruments, charge sheets, and statements of offence are ultra vires, void ab initio.

73.2 Quashing of Convictions and Declarations of Ultra Vires, Void Ab Initio Acts in Ireland

73.2.1 Quashing of all convictions.

73.2.2 Declaration that any and all court rulings in Ireland are ultra vires, void ab initio due to violation of the principle of specialty.

73.3 High Court DNA Retention Orders

73.3.1 Declaration that all High Court DNA retention orders (2001, 2001, and 2002) are ultra vires, void ab initio.

73.4 Extradition-Related Rulings (See item 69 for full framework)

73.4.1 Declaration that all extradition-related rulings before Nuneaton, Westminster, or London courts are ultra vires, void ab initio due to specialty violations and breaches of due process.

73.4.2 These rulings stand vacated.

73.5 Family Court Rulings

73.5.1 All family court rulings in Coventry County Court, Family Division, from October 2003 onward are ultra vires, void ab initio, and stand vacated.

73.5.2 All family court rulings in Newcastle County Court, Family Division are ultra vires, void ab initio, and stand vacated.

73.5.3 The ruling of Tyne and Wear Magistrates Court is ultra vires, void ab initio, and stands vacated.

73.6 Adverse Rulings Linked to Multiple Identities

73.6.1 All adverse rulings affecting any person named:

73.6.1.1 Peter Dunne, or variants with middle names Ian or Ivan

73.6.1.2 Family names Dun, Dunn, Dunne, or variants including Ivan Peter Gan, Peter Ivan Gan, Peter Ian Gan, Ian Peter Gan

73.6.1.3 Birth dates: 7 May 1961, 20 October 1964, or 24 October 1964

73.6.2 These rulings are ultra vires, void ab initio, and stand vacated.

73.7 Records Removal

73.7.1 Any and all police, CAFCASS, and local authority records (Coventry, Northumberland County Councils), and Garda records related to the aforementioned names, and the names of Urszula Domek, Nathan Domek, Gan Choi Yeng, Rebecka Gan, to be permanently removed from all relevant court systems, in so far as legally possible.

73.7.2 Records that cannot be removed are to be sealed under High Court order and accessible only on application on notice.

73.7.3 In respect of Wendy Dixon, records pertaining to her are to be removed under the same conditions, to prevent cross-contamination.

73.7.4 Judicial Visibility and Integrity of Records:

The English common law principle holds that “justice must not only be done, it must be seen to be

done.” In the applicant’s case, the documented record is so egregiously flawed, interlocked, and systematically manipulated that its continued presence perpetuates harm. Therefore, purging or sealing these records is the only effective measure to prevent further damage and to avert the perception that justice has been undone, safeguarding both legal integrity and public confidence.

73.8 Compensation and Damages (Fixed Values)

Note: All values are stated in **Sterling (£)** because the applicant was a lawful resident of the United Kingdom prior to the miscarriage of justice and remained legally resident in the UK even while in Ireland. The applicant’s presence in Ireland constituted unlawful loss of liberty; as with hostage jurisprudence, the last lawful residence retains legal significance rather than the location of de facto detention (see *R v Secretary of State for the Home Department, ex parte Khawaja* [1984] AC 74; *A v Secretary of State for the Home Department* [2004] UKHL 56).

73.8.1 Whole-Life Loss / Family Harm

The following damages reflect not only the emotional and personal devastation of family severance but also the substantial financial benefit losses directly incurred by the claimants. These losses arise from the permanent denial of support from me — a man whose technical innovations were world-leading in fields that have since become multi-billion-dollar industries. The amounts therefore represent both the irreparable personal harm suffered and the measurable deprivation of economic opportunity that each family member endured.

73.8.1.1 Son – loss of father: £75,000,000

73.8.1.2 Daughter – loss of father: £75,000,000

73.8.1.3 Wife, Gan Choi Yeng – loss of spouse: £75,000,000

73.8.1.4 Wendy Dixon – loss of fiancée: £37,500,000

73.8.1.5 Urszula Domek – loss of familial support: £37,500,000

73.8.1.5 Claimant – loss of relationship with Son: £45,000

73.8.1.6 Claimant – loss of relationship with Daughter: £45,000

73.8.1.7 Claimant – loss of relationship with Wife, Gan Choi Yeng: £45,000

73.8.1.8 Claimant – loss of relationship with Fiancée, Wendy Dixon: £45,000

£300,180,000 total personal loss damages

73.8.2 Denial of Kosher Meals / Dietary Restrictions

Fixed Amount: £52,800,000

73.8.2.1 £10,000 per meal over 5,280 meals across four years, reflecting aggravated abuse in violation of binding extradition orders and court recommendations. Each meal constitutes a separate and independent violation.

73.8.2.2 Legal context and violations:

The 2003 extradition was manifestly unlawful and void ab initio.

The 2008 extradition, likewise unlawful, nevertheless had Kosher food as an explicit defence raised before the English courts, thereby forming part of the extradition conditions.

Compliance with such dietary protections is also implicit in every English extradition under the Human Rights Act 1998, which incorporates Articles 3 and 9 of the ECHR.

Authorities then further violated both the 2003 order and the 2009 court recommendations by continuing to deny the mandated dietary provision.

73.8.2.3 Nature of harm:

This deprivation was not only a denial of basic sustenance but also the deliberate infliction of hunger and **multiple instances of onion poisoning**, each constituting a serious risk to life.

73.8.2.4 Scope of damages:

The amount stated above does not include further violations prior to sentence (including multiple additional risk-to-life instances), which have nevertheless been taken into consideration within this damages figure as aggravating conduct that increases the overall award.

73.8.3 Unlawful Detention and Restriction of Liberties

All infringements on my liberty, whether formal or de facto, constitute violations of law and the Constitution, including the principles of due process, the rule of law, and the right to personal freedom. These infringements not only deprived me of liberty but also directly obstructed my ability to innovate, develop enterprise, and secure investment, causing long-term personal, economic, and societal harm.

73.8.3.1 Pre-Imprisonment Restrictions (4 years)

For four years prior to formal imprisonment, my liberties were severely restricted by bail conditions, travel limitations, and administrative controls arising from the unlawful extradition and conviction. During this period, Ireland itself functioned as a de facto prison, with the entirety of my movements, communications, and activities constrained by court orders.

These conditions effectively converted the country into a personal detention environment, equivalent to an open prison, regardless of its physical size.

I was prevented from leaving the country, engaging freely with investors, pursuing professional collaborations, or developing my technologies.

The cumulative effect was a complete restriction of liberty, constituting an ongoing violation of law and constitutional rights.

73.8.3.2 Unlawful Imprisonment (5 years)

I was then unlawfully imprisoned for five years. This period represents a manifest violation of extradition law and the principle of speciality, and is also a constitutional violation as it deprived me of personal freedom without lawful authority.

73.8.3.3 Post-Imprisonment Consequences (13 additional years; total 22 years of cumulative infringement)

Following release, ongoing effects of the unlawful conviction continued to infringe my liberty, including:

Denial of visas and international travel.

Restrictions on the establishment and development of businesses.

Loss of ability to secure investment, partnerships, and commercial contracts.

73.8.3.4 Overall Impact on Innovation and Enterprise

These combined restrictions spanned a total of 22 years, irreparably delaying or preventing the development of compressors, engines, gaming systems, translation systems, and other technical innovations. The cumulative effect represents a direct loss to both my personal agency and global technological advancement.

73.8.3.5 Compensation

Given Ireland has no statutory cap on compensation for unlawful detention, and in

consideration of the aggravated nature of this case—including violation of the principle of speciality, denial of basic rights, and obstruction of innovation—the damages claimed for 22 years of liberty infringement are sought at £10,000 per day. This figure reflects the totality of personal, economic, and societal harm, and recognizes that any loss of liberty, however incurred, constitutes a violation of law and the Constitution

Total £79,980,000

73.8.4 Reputational Harm and Publication Loss

73.8.4.1 Cross-Jurisdictional Harm:

The unlawful detention, conviction, and related legal proceedings caused severe reputational harm across multiple jurisdictions, including the UK, Ireland, Israel, USA, and Singapore. This harm manifested in:

Visa denials and travel restrictions, preventing professional mobility and access to international markets.

Loss of investor confidence, resulting in failed funding rounds, delayed projects, and blocked commercial opportunities.

Damage to credibility and professional standing, impairing the ability to negotiate contracts or establish strategic partnerships.

Cross-border publication and disclosure of proceedings, further amplifying reputational damage and affecting future enterprise development.

73.8.4.2 Impact on Commercial Enterprise:

The reputational harm directly curtailed my ability to develop new technologies, secure investment, and expand businesses internationally, compounding the financial and personal losses arising from the unlawful detention.

73.8.4.3 Fixed Amount:

Considering the scale, duration, and cross-jurisdictional nature of the harm, reputational damages are claimed at £50,000,000. This figure represents a proportionate fraction of the total commercial losses (£1 billion) while acknowledging the intangible, enduring, and global nature of the reputational harm inflicted.

73.8.5 Career, Commercial, and Technological Loss

Note: All values are stated in **Sterling (£)** because the applicant was a lawful resident of the United Kingdom prior to the miscarriage of justice and remained legally resident in the UK even while in Ireland. The applicant's presence in Ireland constituted unlawful loss of liberty; as with hostage jurisprudence, the last lawful residence retains legal significance rather than the location of de facto detention (*see R v Secretary of State for the Home Department, ex parte Khawaja [1984] AC 74; A v Secretary of State for the Home Department [2004] UKHL 56*).

73.8.5.1 Includes inventions and pioneering research:

- 5 compressor types (world-leading)

- 2 continuous burn engine types (unique)

- Energy recovery expansion control, bio sensor, invariant power supply topology

- Translation technologies, fully scalable gaming system

- Published/unpublished research in machine translation, advanced linguistics, polylingual frameworks

73.8.5.2 These damages reflect the loss of commercial and research potential for technologies principally developed outside the periods of detention in Ireland. As such, they are in addition to the aggravated losses accounted for under imprisonment and restriction of liberties in 73.8.3.

73.8.5.3 Commercial damages (gaming system alone conservatively estimated in billions).

73.8.5.4 Fixed Claim for High Court Filing: £1,500,000,000

73.8.6 Exceptional and Extraordinary Damages

73.8.6.1 Compensation for torture, cruel, inhumane, and degrading treatment, including prolonged unlawful detention, repeated unlawful extraditions (2003, 2008), deprivation of rights and legal protections, and the 10 October 2005 attack resulting in permanent amnesia, frozen memories, and severe psychological trauma.

73.8.6.2 Compensation for lifelong severe post-traumatic stress, trauma, and neurological injuries resulting from the above abuses, compounded by the permanent cognitive and memory impairments caused by the 2005 attack and by the deliberate denial of remedial medical care by both nations, leaving no formal medical records available.

73.8.6.3 Legal Basis: Compensation is supported by established precedent, including *Mark Keane v Johnson & Johnson Vision Care (Ireland, 2025)*, in which approximately £800,000 was awarded for severe psychological injury, lifelong PTSD, and trauma even in the absence of full medical records;

Alcock v Chief Constable of South Yorkshire Police (UK, 1992), which recognized psychiatric harm for foreseeable trauma arising from state conduct; Watkins v Home Office (UK, 2006), which confirmed exemplary damages for abuse of public office; and Irish Claims Board / Dillon v Irish Life Assurance plc (2025), which allows recovery for emotional distress, PTSD, and psychiatric injuries without formal documentation.

73.8.6.4 Aggravation Factor: The damages are tripled to reflect the prolonged, compounded, and illegal nature of the conduct, including multiple risk-to-life incidents (onion poisoning, threats during detention), denial of dietary rights over years, 22-year total infringement of liberty and enterprise, and the permanent trauma from the 2005 attack causing amnesia and frozen memories.

73.8.6.5 Fixed Amount: Based on the precedent value of £800,000 for severe psychological injury, tripled for aggravation due to the unlawful, prolonged, and compounded nature of the abuses, the proposed compensation is £2,400,000.

Summary of Justification: The amount is based on legal precedent, adjusted for the severity, prolonged abuse, and permanent cognitive/psychological harm from the 2005 attack. Despite the absence of medical records, compensation is justified based on credible testimony, corroborative evidence, and recognized case law. This award is distinct from and additional to all claims for family loss, business, liberty, kosher denial, or reputational harm.

73.8.7 Whole-Life Aggravated Abuse of Process Damages — Garda Officers' Misconduct

Claim: £10,000,000

Relief Sought:

In addition to damages, the applicant seeks:

- **73.8.7.1 Estoppel** preventing the State and the Garda Síochána from proceeding further in respect of any summons, warrant, or charge arising from the abuse of process by Garda John Costello, Detective Inspector David Finnerty, and Clerical Officer Catherine Hogan.
- **73.8.7.2 Quashing and revocation** of the summons issued by the application of Garda John Costello on or around 1 September 2025, case number 2025/147632, and any derivative proceedings based thereon.

Justification:

This claim is made specifically for the aggravated abuse of process by Garda John Costello, Detective Inspector David Finnerty, and Clerical Officer Catherine Hogan. Their collective actions amount to procedural abuse, deliberate obstruction of due process, and systemic violation of the applicant's fundamental rights under Irish law and the European Convention on Human Rights (ECHR).

The aggravated harm stems from:

1. Procedural abuse and unlawful actions after summons application:

- Garda John Costello issued a summons without valid particulars, omitted lawful procedure, and failed to disclose relevant evidence (see item 70 above).
- Detective Inspector David Finnerty and Clerical Officer Catherine Hogan engaged in questioning of the applicant on 11/06/2025, 13/06/2025, 16/06/2025, and 26/08/2025, after the date of application for summons, in breach of due process and in violation of the principle of specialty under Article 6 ECHR (*Delcourt v Belgium*, 1970; *Heaney and McGuinness v Ireland*, 2000).
- This constitutes harassment and intimidation of the applicant, prolonging uncertainty and distress, and undermining the integrity of judicial process.

2. Destruction of the applicant's last remaining family relationships:

The sustained abuse by the named Garda officers was a significant contributing factor to the permanent breakdown of the applicant's marriage and relationship with his daughter, his last remaining family. This constitutes irreversible emotional harm.

3. Immutable psychological harm and lifelong emotional trauma:

The actions of the officers meet the threshold for torture-level harm under Article 3 ECHR. Established case law (*Assenov v Bulgaria*, 1998; *Kurt v Turkey*, 1998) confirms such damages for deliberate and systemic abuse resulting in lifelong psychiatric injury (*Alcock v Chief Constable of South Yorkshire Police*, 1992).

4. Homelessness and deprivation of liberty:

The applicant was rendered entirely homeless for more than one year due to the procedural abuse, with loss of dignity, autonomy, and shelter.

Legal Basis:

This claim is grounded in the principle of effective remedy under Article 13 ECHR and the prohibition of abuse of process under Irish common law (*Director of Public Prosecutions v Byrne*, [1999] 1 IR 56; *Heaney and McGuinness v Ireland*, [2000] 2 IR 50). The deliberate misconduct by Costello, Finnerty, and Hogan represents a grave departure from the standards of impartiality, legality, and fairness required under law.

Precedent:

The claim references aggravated damages cases in Ireland and the ECHR where awards have ranged up to €5m–€10m for systematic abuse of process resulting in irreversible psychological harm and life-long deprivation of liberty (*C v Ireland*, 1997; *Heaney and McGuinness v Ireland*, 2000). Given the severity and duration of the abuse in this case, a £10,000,000 award is proportionate and necessary to vindicate rights, deter future abuse, and compensate for the permanent, irreparable harm caused.

Conclusion:

The £10,000,000 award sought in 73.8.7 reflects:

- the aggravated abuse of process specifically attributable to Garda John Costello, Detective Inspector David Finnerty, and Clerical Officer Catherine Hogan,
- the destruction of the applicant's last remaining family,
- lifelong emotional trauma,
- permanent psychological harm,
- over a year of homelessness, and
- the obstruction of due process.

This figure is consistent with the highest-level abuse of process awards in Ireland and under the ECHR, adjusted upward for the extreme nature of the violations in this case.

73.9 Total Fixed Damages

73.9.1 Family and Personal Losses

Family whole-life losses: £300,180,000

Kosher / dietary violations: £52,800,000

Unlawful detention and restriction of liberties: £79,980,000

Reputational harm: £50,000,000

Exceptional and extraordinary damages (severe trauma, 2005 attack, PTSD): £2,400,000

Subtotal Family and Personal Losses: £485,360,000

73.9.2 Commercial / Technological Losses

£1,500,000,000

73.9.3 Grand Total

£1,985,360,00

73.10 Estoppel Against Any Investigation or Tribunal

73.10.1 The Principal Applicant invokes the doctrine of estoppel against any investigation, prosecution, or tribunal process by any authority of the State of Ireland or the United Kingdom, including but not limited to:

- Garda Síochána
- Director of Public Prosecutions (Ireland)
- GSOC
- Crown Prosecution Service (UK)
- Police Service of Northumberland
- Warwickshire Police
- Shropshire Police

- Metropolitan Police Service (London)
- West Midlands Police
- Coventry County Council
- Northumberland County Council
- Judiciary of the United Kingdom and Ireland
- Prison Services of the United Kingdom and Ireland

73.10.2 Grounds:

The Applicant avers that the corruption, prejudice, and direct involvement of state actors in this matter are so deep, systemic, and entrenched that no investigation, commission, tribunal, or special prosecution could meet the threshold of independence, impartiality, or fairness necessary for justice to be done. This includes even proceedings against those guilty of abuse against the Applicant, because:

- The record demonstrates persistent, deliberate, and unrelenting malfeasance in every warrant, order, summons, and action since 2001.
- The systemic collusion between state actors — including the Director of Public Prosecutions and Garda officers such as Garda John Costello, Detective Inspector David Finnerty, and Clerical Officer Catherine Hogan — precludes any prospect of a fair hearing.
- Oversight bodies such as GSOC are structurally incapable of impartial investigation, being composed of former or current Gardaí and subject to institutional bias (Irish Human Rights and Equality Commission Reports, 2022–2023; Disclosures Tribunal Final Report, 2023).
- Any process undertaken would be compromised by the same corruption and prejudice that gave rise to the wrongs suffered.

73.10.3 Legal Basis:

Under the principles of natural justice, the rule of law, and the principle of *nemo iudex in causa sua*, no tribunal or prosecutorial body can lawfully act where independence and impartiality are

absent. In the present case, the totality of evidence establishes that no process under Irish or UK jurisdiction could satisfy these requirements.

73.10.4 Remedy:

The Applicant respectfully seeks a declaration that any attempt by the above-named authorities or any other agency of the States of Ireland or the United Kingdom to investigate, prosecute, or otherwise take action relating to the matters in this case is **estopped** in law and that no hearing, tribunal, or investigation — even of those guilty — can be fair, valid, or lawful.

73.10.5 Immutable Record:

The Applicant asserts that the entirety of his court filings, accompanying evidence, and published works constitute a permanent, immutable record of the wrongs committed. This record must be recognised by any court or tribunal as sufficient for justice, without recourse to further investigation.

73.10.6 Effect:

This declaration would permanently bar any such investigation or prosecution and require that any attempt to proceed is a nullity at law, regardless of the identity or alleged offence of the persons involved.

74. Covering Statement on Exhibited Extracts

74.1 The documentary evidence submitted consists of extracts from reports and assessments only.

74.2 Each extract includes:

- (a) the heading of the report, establishing origin and authority;
- (b) the name of the officer or author responsible; and
- (c) the passages evidencing violations.

74.3 The violations demonstrated consist of:

- (a) false factual assertions, amounting to perjury and misleading the court;
- (b) redactions made contrary to explicit court order, amounting to contempt of court; and
- (c) contamination carried forward from the 2003 extradition, tainting all subsequent proceedings.

74.4 Some documents are presented in clipped form as they were received clipped. In addition, minor resizing may be visible due to document-processing software.

74.5 The Court is not asked to rule upon the substance of the reports themselves but to consider that the identified contamination and misconduct render all subsequent proceedings incapable of meeting the standards of fair and just procedure, irrespective of any procedural safeguards.

The documents as attached are

Peter Dunne Victim Impact Statement.pdf

attachmentsA.pdf containing

1. Birth Certificate
2. Passport, Passport Card
3. UK Driving License
4. Singapore Employment Pass 2016
5. Custody Records
6. DNA Retention Order 21 Dec 2001, (2001 2750SS)
7. DNA Retention Order 28 June 2002
8. DNA Retention Order 19 Dec 2002
9. 2003 Irish Warrant
10. UK Summary of Evidence
11. 2003 Magistrates Warrant

attachmentsB.pdf containing

12. Charge Sheet
13. Statement of Offence
14. 2007 Bench Warrant
15. 2008 EAW

attachmentsC.pdf containing

16. 2007 Certificate of Conviction (sourced via English Police, unserved by Ireland)
17. 2007 Certificate of Conviction and Sentence (sourced via English police, unserved by Ireland)
18. 2009 Certificate of Conviction and Sentence (Illegally altered, Served)
19. Magistrate Court Order 1 & 2 (SOR)

attachmentsD.pdf containing

20. Coventry County Court Judgements (family division)
 1. District Judge Cotterill 9 August 2005

2. District Judge Jones 8 December 2005
3. Judgement, only front page still in my possession
4. District Judge Waterworth 20 September 2005
21. Solicitors Letter, 4 April 2007, T. Lyons.
22. Solicitors Letter, 15 May 2007, T. Lyons.
23. Ambrose Dunne, Witness Statement
24. Johanna Dunne, Witness Statement
25. Solicitor Letter 30/02/07, Gerald Meaney (DPP)

Proof of British Nationality

26. homeoffice.pdf

attachmentsE.pdf containing

27. Newcastle County Court Judgements (family division)
 1. Court Order, P2 shows knowledge I had left jurisdiction
 2. Proof of video link violation
 3. Disclosure order, Warwickshire County Council Children's Services
 4. Disclosure order, Northumbria Police
 5. Disclosure order, Warwickshire Constabulary
 6. Disclosure order, Staffordshire Police

attachmentsF.pdf containing

28. Police, Northumbria Police
29. Prosecutors Print, MNCID : 06/544824Q, source Northumberland Police
30. Redacted Reports, Warwickshire Police
31. Redacted Reports, West Midlands Police
32. Northumberland Police

Additional materials from family law case

33. 18-10-2021 20C110A.pdf
34. 10-10-2021 swet.pdf
35. 02-11-2021 Risk assessment of Choi Yeng Gan (G).pdf
36. ics reports.pdf
37. Wcc-nathan.pdf
38. CC interference daughter p1.png
39. CC interference daughter p2.png

Technical Background

40. Resume.pdf

41. Technological Overview techoverview.pdf

Additional Materials

42. Legalcorrespondence.pdf

43. Magistrate_court.pdf

44. m-buggy-solicitor.jpg

75. Notification of Public Identification

75.1 This application gives notice of my intention to publicly identify any and all persons responsible for the miscarriage of justice in this matter, including but not limited to Judges, Solicitors, Police Officers, Social Workers, and others.

75.2 I exercise my inherent right, grounded in natural justice, to expose those responsible for the abuse inflicted upon myself and my family.

75.3 Having been publicly humiliated, I assert my right of response. This right is recognised in:

(a) **Article 10 of the European Convention on Human Rights**, guaranteeing freedom of expression, including the right to impart information;

(b) **Article 6 ECHR**, guaranteeing the right to a fair and public hearing, including the principle of open justice; and

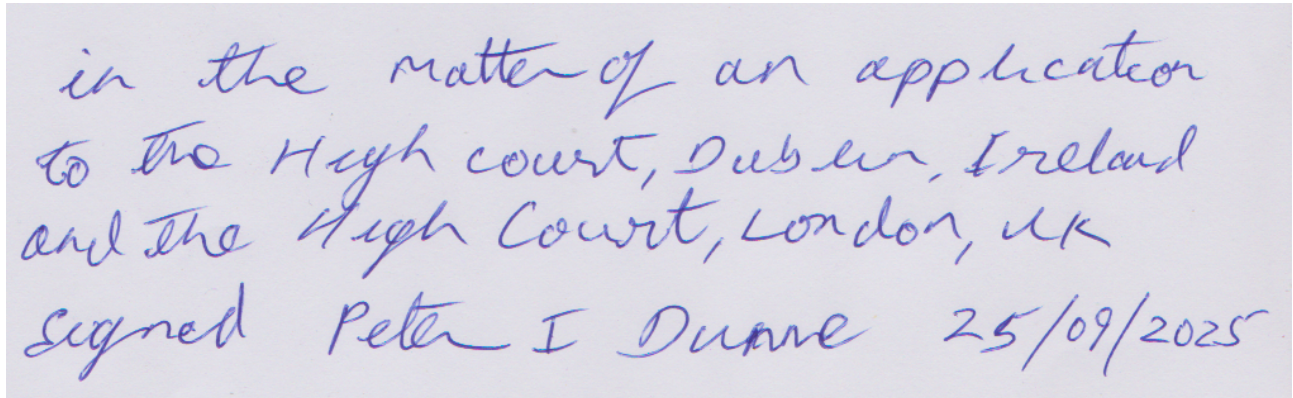
(c) the common law principle of **open justice**, affirmed in *Scott v Scott* [1913] AC 417 and *A v British Broadcasting Corporation* [2014] UKSC 25.

75.4 It is submitted that no order of the courts of England or Ireland can lawfully prevent the exercise of these rights. Any restriction would be unlawful unless it satisfied the strict requirements of Article 10(2) ECHR, namely being (i) prescribed by law, (ii) necessary in a democratic society, and (iii) proportionate to a legitimate aim. In the circumstances of this case, no such restriction could be justified.

75.5 It is my assertion before these Courts that, based on the documented evidence I have presented, there can be only one conclusion regarding those responsible for the abuses my family and I have suffered: that they are wilful and systematic perpetrators of racial and religious discrimination, cruelty, corruption, and abuse. This conduct has been directed mercilessly at my daughter from the day of her birth, at my son since he was little more than three years old, and at my wife, my former fiancée, and myself — all outside any justification, law, or morality.

As I do not have a functioning printer, I could not print, sign and scan documentation, I have therefore handwritten signature for inclusion as signature to these documents.

These documents have been prepared in good faith to the best of my recollection and knowledge of the facts in this matter.



in the matter of an application
to the High court, Dublin, Ireland
and the High Court, London, UK
Signed Peter I Duane 25/09/2025