

Statement of evidence of Stephen Manning D.O.B 06/09/1958 of Belcarra, Castlebar, Co. Mayo, presented to

At

on

(1 page)

I hereby declare that this statement is true to the best of my knowledge and belief and I make this statement knowing that if it is tendered in evidence I will be liable for prosecution if I say anything in it which I know to be false or misleading or do not believe to be true.

Statement of complaint against Ms [redacted] and Ms [redacted] of 'TUSLA' (HSE Child & Family Agency) and any additional parties who can be demonstrated to have participated in, or contributed to, the construction of a report ('the HSE report') first seen by the complainants, Dr Stephen Manning and Mrs Noriko Manning in Castlebar District Court on Thursday April 24th 2014.

The complainants had first sight of the aforesaid 'HSE report' in Castlebar District Court before Judge Mary Devins on Thursday April 24th 2014 at approximately 4.20pm. The Mannings had previously made several formal requests in writing, including under the **Data Protection Act** and the **Freedom of Information Act** to know the detail of certain allegations which were contained in this HSE report, but were variously refused, ignored or denied by; (i) the HSE Child & Family Agency, (ii) An Garda Siochána; (iii) [redacted] (iv) Patrick Durkan solicitors, acting for the HSE. Likewise, the complainants were advised by Judge Mary Devins in Court that they were not entitled to a hard copy of said report, but that the Mannings could read the report and take notes. However, Judge Devins said that the various 'professionals' involved in the case could have copies of the report.

Having had sight of the HSE report, the complainants, Dr Stephen Manning and Mrs Noriko Manning hereby allege that it is a contrived and malicious document, constructed under highly suspicious circumstances by individuals who have a proven history of deviousness, collusion and other underhanded activities designed to undermine and unjustly attack the integrity of Dr Manning in particular, and by association, to unjustly affect the happiness and well-being of the Manning family.

The report not only contains blatant untruths and deliberately misleading statements, but it fails to include important details and facts that are germane to the issues at hand and which would mitigate the insidious allegations therein. The report is constructed in such a manner as to cause maximum damage in the eyes of any reader—to Dr Manning's person, character and reputation —through the malicious and unnecessary repetition of allegations which the HSE already knows to be false and spurious. Given we are prepared to demonstrate – through documentation, eyewitness testimony and video and audio recordings – that the circumstances surrounding the construction of 'the HSE report' indicate a deliberate and premeditated attempt to defame Dr Manning; to cause the Manning family maximum distress and anxiety; and ultimately to pervert the course of justice – this therefore defeats the defence of 'privilege' which is usually ascribed to such reports.

We request that An Garda Siochána investigates this matter and the surrounding circumstances with a view to issuing criminal prosecutions against those who were complicit in this criminal activity.

This statement has been read over to me by
at.....on..... I have been invited to make any additions or corrections I deem necessary. I have done so. This statement is correct.

Signed:

Date:

Witness: