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Additional Written Submissions by Shane Dowling
Hearing: 4th May 2017

COURT DETAILS

Court	Supreme Court of New South Wales
Division	Common Law
Registry	Sydney
Case number	2017/94322
Matter	**Prothonotary of the Supreme Court of New South Wales v Shane Dowling**

Cited cases (Click on below links for full judgments):

Speech - 7 October 2007

Judicial Conference of Australia Colloquium 2007 – Sydney

How The Implied Constitutional Freedom Of Communication On Government And Political Matter May Require The Development Of The Principles Of Open Justice

Justice Steven Rares

Lange v Australian Broadcasting Corporation ("Political Free Speech case") [1997] HCA 25

Nationwide News Pty. Limited v. Wills [1992] HCA 46; (1992)

Coleman v Power [2004] HCA 39; 220

McCloy v New South Wales [2015] HCA 34 (7 October 2015)

John Fairfax Publications Pty Limited v the Attorney General for New South Wales [2000] NSWCA 198

Theophanous v Herald & Weekly Times Ltd (1994) 182

Ex parte Bread Manufacturers Limited; Re Truth and Sportsman Limited (1937) 37 SR (NSW) 242 at 249-250

FILING DETAILS

Filed for	Shane Dowling - Defendant
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Written submissions - Content

1. Constitutional Law and relevant issues
2. Charges
3. Justice Steven Rares – Extract from a Speech at the Judicial Conference of Australia Colloquium – Sydney 7 October 2007 - the implied constitutional freedom of communication on government and political matter.
4. Applicants have failed to file any evidence denying the claims or any identify any damage caused. The applicants have also not sued for defamation, complained about the articles I have written or taken the opportunity I offered to deny or respond to the previous allegations that I published on my website last year and previously.
5. Richard Keegan's affidavit needs to be struck out as being unreliable and scandalous.
6. Kerry Stokes and the courts using the threat of contempt and jail to silence the public from using the freedom of political communication.

1. CONSTITUTIONAL LAW - incompatibility with the Commonwealth Constitution

Constitutional issues:

1. Is what is said in court protected by the freedom of communication on matters of government and politics as per Lange v ABC (1997) HCA?

A. Yes. As per Lange v ABC (1997) HCA and Nationwide News Pty. Limited v. Wills [1992] HCA 46; (1992) etc.

2. Is criticism and/or allegations of corruption against Judicial officers protected by the freedom of communication on matters of government and politics as per Lange v ABC (1997) HCA?

A. Yes. As per Lange v ABC (1997) HCA, Nationwide News Pty. Limited v. Wills [1992] HCA 46; (1992), Theophanous v Herald & Weekly Times Ltd (1994) 182 and Coleman v Power [2004] HCA 39; 220 etc.

3. Are suppression orders issued by a court invalid if they infringe on the freedom of communication on matters of government and politics as per Lange v ABC (1997)?

A. Yes. As per Lange v ABC (1997) HCA, John Fairfax Publications Pty Limited v the Attorney General for New South Wales [2000] NSWCA 198 and Nationwide News Pty. Limited v. Wills [1992] HCA 46; (1992) etc.

4. Are proceedings for contempt invalid if they infringe on the freedom of communication on matters of government and politics as per Lange v ABC (1997)?

A. Yes. As per Lange v ABC (1997) HCA, John Fairfax Publications Pty Limited v the Attorney General for New South Wales [2000] NSWCA 198 and Nationwide News Pty. Limited v. Wills [1992] HCA 46; (1992) etc.

The Lange Test

The Lange test is set out in McCloy v New South Wales [2015] HCA 34 at paragraph 2:

2. As explained in the reasons that follow, the question whether an impugned law infringes the freedom requires application of the following propositions derived from previous decisions of this Court and particularly *Lange v Australian Broadcasting Corporation*[1] and *Coleman v Power*[2]:

    A. The freedom under the Australian Constitution is a qualified limitation on legislative power implied in order to ensure that the people of the Commonwealth may "exercise a free and informed choice as electors."[3] It is not an absolute freedom. It may be subject to legislative restrictions serving a legitimate purpose compatible with the system of representative government for which the Constitution provides, where the extent of the burden can be justified as suitable, necessary and adequate, having regard to the purpose of those restrictions.

    B. The question whether a law exceeds the implied limitation depends upon the answers to the following questions, reflecting those propounded in *Lange* as modified in *Coleman v Power*:

        1. Does the law effectively burden the freedom in its terms, operation or effect?

If "no", then the law does not exceed the implied limitation and the enquiry as to validity ends.

2. If "yes" to question 1, are the purpose of the law and the means adopted to achieve that purpose legitimate, in the sense that they are compatible with the maintenance of the constitutionally prescribed system of representative government[4]? This question reflects what is referred to in these reasons as "compatibility testing".

The answer to that question will be in the affirmative if the purpose of the law and the means adopted are identified and are compatible with the constitutionally prescribed system in the sense that they do not adversely impinge upon the functioning of the system of representative government.

If the answer to question 2 is "no", then the law exceeds the implied limitation and the enquiry as to validity ends.

Nationwide News Pty. Limited v. Wills (1992) 177 CLR 1**:** attack on the integrity and independence of the Australian Industrial Relations Commission

Facts: The plaintiff (Nationwide News) was the holding company of the proprietor of The Australian (a nationwide Australian newspaper). In 1989 an article was published in that paper which contained an attack on the integrity and independence of the Australian Industrial Relations Commission and its members. The plaintiff was prosecuted under s299(1)(d)(ii) of the *Industrial Relations Act 1988* (Cth) which reads 'A person shall not ... by wiring or speech use words calculated ... to bring a member of the Commission or the Commission into disrepute.' The defendant challenged the constitutional validity of s299(1)(d)(ii).

Held: The court held unanimously that the challenged provision was invalid, however, the way in which that conclusion was reached in the different judgments differs widely. Mason CJ, Dawson and McHugh JJ held that the provision was invalid on the ground that the protection it afforded the Commission was so disproportionate that it stood outside the incidental scope of the power in s51(xxxv) of the Constitution (the constitutional power to make laws with respect to conciliation and arbitration for the prevention of industrial disputes). Brennan, Deane, Toohey and Gaudron JJ held that the law may have been within the scope of s51(xxxv) but, in any event, the law infringed the Constitution's implied right to freedom of communication about matters relating to the government of the Commonwealth.

Not only does legislative law have to conform to the requirements of the must conform to the requirements of the Constitution but common law does as well (See Lange v ABC). In Nationwide News Pty. Limited v. Wills (1992) the High Court found the legislative law was invalid.

I have been charged with contempt which is common law but believe the court is bound by Lange v ABC and Nationwide News Pty. Limited v. Wills (1992) etc to find that the common law contempt charges are invalid in my matter as they have also infringed the Constitution's implied right to freedom of communication about matters relating to the government.

You cannot legislate to restrict someone's freedoms to criticise courts nor can common law restrict those same freedoms.

2. Charges

I have pleaded not guilty to the charges against me. The charges are that on the 3rd February 2017 I said in court:

1. That I called Registrar Christopher Bradford and bribe taker and a paedophile.
2. That Justice Clifton Hoeben is a paedophile
3. That on the 5th February 2017 I breached suppression orders that Justice Beech-Jones had issued oi the 3rd February and published an article naming Chief Justice Bathurst, Justice Hoeben and Registrar Bradford and saying what was said in court.

I plead not guilty because I did not say what I have been accused of and even if I did I am protected under section 3 of the Australian Constitution in that what I said was political

communication. And the suppression orders are invalid because they restrict political communication and the article I published on the 5th of February was clearly political communication. For example, it raised the issue of how corrupt it is for judicial officers tio have their own court put suppression orders on their own matter.

In relation to Registrar Bradford what I said was he is a known bribe taker and suspected paedophile and which I have said to his in writing and in court last year which he did not complain about.

In relation to Justice Clifton Hoeben what I called him in court was a grub and that was in relation to him giving a paedophile priest who raped 3 boys only 3 months in jail.

The issues I raised are cleary political issues. Bribery equals corruption and there are many precedents supporting that being a political issue. In relations to paedophilia and the sentencing or paedophiles that is clearly a political issue given the Royal Commission into Institutional Responses to Child Sexual Abuse and Justice Peter McClellan has said is recent speeches that the sentencing of paedophiles is an issue that he has to deal with in his report for the government in December 2017 which reinforces that fact that it is a political issue.

I addressed the above issues issues further which will be in the transcript from the hearing on the 4th May 2015.

3. Justice Steven Rares – Extract from a Speech at the Judicial Conference of Australia Colloquium – Sydney 7 October 2007

How The Implied Constitutional Freedom Of Communication On Government And Political Matter May Require The Development Of The Principles Of Open Justice

Below is an extract from Justice Rares speech that covers the relevant issues raised in my matter.

13. As Lord Shaw of Dumfermline remarked in Scott v Scott the principle had moved Jeremy Bentham to say:

‘Publicity is the very soul of justice. It is the keenest spur to exertion, and the surest of all guards against improbity. It keeps the judge himself, while trying, under trial.’

The implied constitutional freedom

20. An implication is a curious thing. It is an expression or meaning conveyed by, or inherent within, words spoken or used in a document. But it involves a different concept, idea or matter. The statement or document necessarily conveys, at the same time and by the same medium, something which has not been explicitly stated. Politicians have a gift for creating

implications of all sorts, particularly in the language they use in legislation. An implication is not, however, connoted by Sir Winston Churchill's prognostication of the likely action of Russia in October 1939 as being:

'… a riddle wrapped in a mystery inside an enigma …'

21. Our country's founding fathers were wise enough to create a constitution in which implications abound. As Dixon J said in Australian Communist Party v The Commonwealth , the Constitution:

'… is an instrument framed in accordance with many traditional conceptions, to some of which it gives effect, as, for example in separating the judicial power from other functions of government, others of which are simply assumed. Among these I think that it may fairly be said that the rule of law forms an assumption.'

22. That assumption profoundly affects the way in which the Australian nation is governed. Even though New Zealand has not yet taken up the opportunity afforded by s 6 of the Commonwealth of Australia Constitution Act 1900 (Imp) , to be admitted as part of the Commonwealth of Australia, its former Prime Minister, the Rt Hon David Lange was instrumental in exposing an implication in the Constitution of the Commonwealth. The High Court noted that discussion of matters concerning New Zealand may often throw light on government or political matters in Australia . This was because of matters such as geography, history and the constitutional and trading arrangements between our nations. It is unlikely that their Honours had in mind what Mr Lange said in his valedictory speech in 1996 to the Parliament of New Zealand:

'I want to thank those people whose lives were wrecked by us. They had been taught for years they had the right to an endless treadmill of prosperity and assurance, and we did them. People over 60 hate me.'

23. He noted that his mother had attacked him publicly on a surcharge his government had imposed, saying 'She was Australian.'

24. The subject matter of the defamation on which he sued is not revealed by the report of Lange v Australian Broadcasting Corporation . Mr Lange had commenced the proceedings in 1989, while Prime Minister. He alleged that the ABC had broadcast a 'Four Corners' program which conveyed a number of defamatory imputations including that he was guilty of abuse of public office and he was unfit to hold public office. The defendant broadcaster sought to plead a defence of qualified privilege arising pursuant to a freedom guaranteed by the Constitution.

25. The High Court held that freedom of communication on matters of government and politics was an indispensable incident of the system of representative government which the Constitution creates by directing that the members of the House of Representatives and the Senate shall be 'directly chosen by the people' of the Commonwealth and the States,

respectively . So, when a law of a State or federal Parliament or a Territory legislature is alleged to infringe the requirement of freedom of communication imposed by ss 7, 24, 64 or 128 of the Constitution, the Court said that two questions had to be answered before the validity of the law could be determined. Those questions were:

1. Does the law effectively burden freedom of communication about government or political matters either in its terms, operation or effect?

2. If the law effectively burdens that freedom, is it reasonably appropriate and adapted to serve a legitimate end in a manner which is compatible with the maintenance of the constitutionally prescribed system of representative and responsible government and the procedure prescribed by s 128 for submitting a proposed amendment of the Constitution to the informed decision of the people?

26. If the first question were answered 'Yes' and the second 'No', the law is invalid .

27. In Lange , Brennan CJ, Dawson, Toohey, Gaudron, McHugh, Gummow and Kirby JJ characterised the implication as being negative in nature: it invalidates laws and, consequently, creates an area of immunity from legal control, particularly from legislative control, but the implied freedom confers no rights on individuals.

28. The second question involves the formation of a value judgment, rather than a determination that the law is either essential or unavoidable. There is little difference between the concept of 'reasonably appropriate and adapted' and the notion of 'proportionality' .

Are courts, judges or judgments within the implied constitutional freedom?

29. An underlying rationale in Lange is that the electors must have the ability to acquire relevant information in order to cast a fully informed vote in an election for members of the Parliament. Accordingly, the ability to cast such a fully informed vote depends upon the freedom of communication which Lange identified as an indispensable incident of the representative government mandated by the Constitution . Gummow, Kirby and Crennan JJ pointed out in Roach that a law will be invalid which proscribes communication under the guise of characterising it as 'abusive' or 'insulting' or 'offensive' if the words used are not so hurtful that they may be regarded as intended, or to be reasonably likely, to provoke unlawful physical retaliation. Gummow, Kirby and Crennan JJ explained the decision in Coleman v Power , saying :

'Were that not so, and were a broader meaning given to the area of proscribed communication then the end served by the statute would necessarily be the maintenance of civility of discourse;

given the established use of insult and invective in political discourse, that end could not satisfy the second question or test in Lange .'

30. Another effect of the constitutional implication is that the common law must conform with it. As the Court said in Lange :

'The development of the common law in Australia cannot run counter to constitutional imperatives . The common law and the requirements of the Constitution cannot be at odds.'

So, the Court decided that the common law of qualified privilege in defamation proceedings should be developed consistently with the existence of the implied constitutional freedom to discuss government and political matters .

31. Gleeson CJ, Gummow, Hayne and Heydon JJ said in D'Orta-Ekanaike v Victoria Legal Aid :

'The community has a vital interest in the final quelling of controversies which are brought to the judicial arm of government to resolve.'

32. They said that the reference to the 'judicial branch of government' was more than a mere collocation of words designed to instil respect for the judiciary. They said it reflected a fundamental observation about the way in which our society was governed.

33. The extent to which communication about the judicial branch is included within the umbrella of 'government and political matter' is a topic of on-going judicial consideration. Debate abounds . Perhaps this is a consequence of the view taken by Gleeson CJ and Heydon J in APLA that the meaning of the expression 'freedom of communication about government or political matters' is 'imprecise' .

34. In APLA McHugh J said that there was a difference between a communication concerning legislative and executive acts or omissions involving the administration of justice on the one hand and, on the other hand, communications concerning that subject which did not involve, expressly or inferentially, acts or omissions of the legislature or executive government. Included in the topics which could attract the Lange freedom were discussion of appointment or removal of judges, the prosecution of offences, withdrawal of charges, the provision of legal aid and the funding of courts. McHugh J reasoned that that was because each of these concerned activities of the legislature or executive government. But, he said, communications concerning the results of cases or the reasoning or conduct of the judges who decide them, were not ordinarily within the Lange freedom. He recognised that this distinction 'may sometimes

appear to be artificial' but said that it resulted from the necessity to promote and protect representative and responsible government. He continued :

'Courts and judges and the exercise of judicial power are not themselves subjects that are involved in representative or responsible government in the constitutional sense.'

35. So, in APLA, McHugh J held that the implied freedom does not extend to communication about the exercise of judicial power by courts. He said:

'Lange refers to "political or government matters". But those words must be read in the context of the decision. That context leaves no doubt that the term "government" is used to describe acts and omissions of the kind that fall within Chs I, II and VIII of the Constitution. It refers to representative and responsible government. In a broad sense, "government" includes the actions of the judiciary as the third branch of government established by the Constitution. But the freedom of communication recognised by Lange does not include the exercise of the judicial power of the Commonwealth by courts invested with federal jurisdiction or, for that matter, the judicial power of the States. Nothing in Lange or the subsequent decision of this Court in Coleman v Power supports the proposition that the exercise of judicial power is within the freedom recognised by Lange.' (Footnotes omitted.)

(Shane Dowling: What Justice McHugh said would still support the defence in my matter as he said issues such as the removal of judges would attract the Lange freedom. If a judge is alleged to be taking bribes that would be clearly an issue that would require the removal of a judge and also if they were a paedophile. Justice McHugh also said: "*communications concerning the results of cases or the reasoning or conduct of the judges who decide them, were not ordinarily within the Lange freedom.*"

At the time Justice McHugh said that there was no Royal Commission into Institutional Responses to Child Sexual Abuse and Justice Peter McClellan had not pointed out he needed to responded to sentencing at the request of the government. So I am sure that Justice McHugh would support the Lange freedom in my matter)

36. On the other hand, Kirby J tellingly disagreed with McHugh J, saying :

'Communication about access to courts is communication about government and political matters. The courts are part of government. They resolve issues that are, in the broad sense, political, as this case clearly demonstrates.'

37. In John Fairfax Publications Pty Limited v Attorney-General (NSW), Spigelman CJ described the task undertaken by the High Court in Lange as one of 'explaining the elliptical and expounding the unexpressed'. In that case the Court of Appeal of the Supreme Court of New South Wales held that part of s 101A of the Supreme Court Act 1970 (NSW) was not a valid law. The section permitted the Attorney-General to refer questions of law arising out of the acquittal of a person on a charge of criminal contempt to the Court of Appeal. This procedure would not impugn the acquittal. It is similar to the well-known power to refer to criminal appellate review questions of law arising out of acquittals.

38. In Fairfax the section required the proceedings to be heard in camera and prohibited publication of any submissions made on the reference and the identity of the alleged contemnor. Any contravention of those restrictions on publication was punishable as a contempt of the Supreme Court. Spigelman CJ, with whom Priestley JA agreed on this point, held that the requirement that the whole of the proceedings be in camera went well beyond what was necessary in order to achieve the objective of the legislation. They also held that the prohibition against publication of a report of any reference also went well beyond what was required in order to serve that objective . But, they held that the legislation was valid in prohibiting publication disclosing the acquitted person's identity.

39. The majority held that the State Attorney-General had power under s 101A to make a reference in respect of contempt charges that arose in the exercise of federal jurisdiction by State courts. Thus, his or her role in making a reference was the same whether the charges arose under State or federal jurisdiction. Furthermore, Spigelman CJ pointed out that the policy of a State Attorney-General, manifest in contentions or submissions put to a court on his or her behalf, may be relevant to government or political decisions at a Commonwealth level. Questions could arise about whether the Commonwealth should exercise such powers as it may have to affect the operations of State courts in the exercise of federal jurisdiction, or indeed, whether it should confine or remove the conferral of such jurisdiction. The law of contempt, being part of the common law of Australia applicable to all courts, including Federal courts and State courts exercising federal jurisdiction, could also affect the exercise of rights protected by the implied constitutional freedom of communication on government and political matters. Spigelman CJ said that when a State Attorney-General institutes and prosecutes proceedings with respect to the law of contempt, he or she is exercising a function of government with respect to the law of contempt that could involve the protection of the process of the Court exercising federal jurisdiction.

40. The Chief Justice and Priestley JA rejected the contention that the requirement to sit in camera and the prohibition of publicity of the institution of the reference were reasonably appropriate and adapted to serve a legitimate objective, namely the protection from further adverse publicity of a person acquitted of a criminal charge .

Interaction of the two principles – Open justice and freedom of communication on government and political matter

41. The Fairfax case emphasised the interaction of the law of contempt, the exercise of freedom of speech and the implied constitutional freedom of communication. This interaction may in part have been anticipated by the celebrated judgment of Jordan CJ in the Bread Manufacturers Case, where he said:

'It is of extreme public interest that no conduct should be permitted which is likely to prevent a litigant in a Court of justice from having his case tried free from all matter of prejudice. But the administration of justice, important though it undoubtedly is, is not the only matter in which the public is vitally interested; and if in the course of the ventilation of a question of public concern matter is published which may prejudice a party in the conduct of a law suit, it does not follow that a contempt has been committed. The case may be one in which as between competing matters of public interest the possibility of prejudice to a litigant may be required to yield to other and superior considerations. The discussion of public affairs and the denunciation of public abuses, actual or supposed, cannot be required to be suspended merely because the discussion or the denunciation may, as an incidental but not intended by-product, cause some likelihood of prejudice to a person who happens at the time to be a litigant.

It is well settled that a person cannot be prevented by process of contempt from continuing to discuss publicly a matter which may fairly be regarded as one of public interest, by reason merely of the fact that the matter in question has become the subject of litigation, or that a person whose conduct is being publicly criticised has become a party to litigation either as plaintiff or as defendant, and whether in relation to the matter which is under discussion or with respect to some other matter ... .'

4. Applicants have failed to file any evidence denying the claims or identify any damage caused.

The applicants have also not sued for defamation, complained about the articles I have written or taken the opportunity I offered to deny or respond to the previous allegations that I published on my website last year and previously.

Neither Chief Justice Tom Bathurst, Justice Clifton Hoeben or Registrar Christopher Bradford have filed affidavits in the matter against me.

On that basis alone the charges against me should be dropped.

It might be argued that Chief Justice Bathurst and Justice Clifton Hoeben were not in court when I send the alleged allegations.

But as the video shows Registrar Christopher Bradford was sin court and he was the one who obviously made the complaint as he said he would "take the matter further". One can only assume the reason that Registrar Bradford has not filed an affidavit is because he would not hold up as a credible witness under cross examination.

For example, Registrar Christopher Bradford needs to explain why he believes it is now a contempt to say that I have written on my website that he is a known bribe taker and suspected paedophile yet he took no action in September 2016 when I said the exact same thing as the video evidence shows.

5. Richard Keegan's affidavit needs to be struck out as being unreliable and scandalous.

Over the last 3 years Richard Keegan has written at least ten affidavits in various matters against me on behalf of Kerry Stokes and his associated companies and staff. Which included at least 2 affidavits for contempt matters. Mr Keegan has given contradictory evidence at times and I have accused him of perjury including in a recent article titled "Seven West Media pay to have journalist found guilty of contempt of court in Seven sex scandal".

Mr Keegan is his affidavit has deliberately edited the transcript to make it seem like I called Justice Clifton Hoeben a paedophile but when the full transcript is read it is obvious that I have called Clifton Hoeben a grub.

The prosecutor has referred to Richard Keegan affidavit with the edited transcript as evidence that I have called Justice Hoeben a paedophile which is scandalous.

Richard Keegan also claims I was aggressive etc. While I might have raised my voice one tone for a few seconds I was hardly aggressive and the video shows that.

I was also denied the opportunity to cross examine Richard Keegan which I find disturbing given I had cross examined Mr Keegan 2 other times this year. And given that Richard Keegan was not in court how did the prosecution know I would not be allowed to cross examine Richard Keegan?

The net effect is the prosecution are relying on an untested affidavit of someone I have accused in court and on my website of perjury and by someone who has written over ten affidavits for his clients against me.

6. Kerry Stokes and the courts using the threat of contempt and jail to silence the public from using the freedom of political communication.

Kerry Stokes and his associated companies have been using various non-publication orders, suppression orders and even super-injunctions (where I am not even allowed to tell anyone there is a court case) to silence me over the last 3 years. A lot of it has been to silence me from utilising my freedom of political communication. And the current charges I am facing as per above is another attempt to silence me which is no surprise given I publish a judicial corruption website.

Some of the orders that have been issued are:

14th April 2014 – Monday – Justice Ian Harrison – ex parte – Super injunction issued

6th May 2014 – Tuesday – Justice Lucy McCallum – ex parte – Notice of Motion abridged (expeditated)

17th February 2015 – Tuesday – Act Justice Robert Hulme – ex parte – suppression orders

5th June 2015 – Friday – Justice David Davies – ex parte – Suppression order issued for Ryan Stokes who wasn't even a party to the proceedings at that time

7th October 2016 – Justice Peter Hall – ex parte – Super injunction issued

10th October 2016 – Justice David Davies – ex parte – suppression order issued

21st December 2016 – Justice Stephen Campbell – ex parte – suppression order issued

23rd December 2016 – Justice Stephen Campbell – ex parte – suppression order continued

21st February 2016 – Justice Walton – ex parte – suppression order issued

Add the orders listed above to the orders that have been issued in this matter and it starts to show what a scandal it is.

Kerry Stokes and his companies such as Seven West Media have also taken out wide-ranging suppression orders against people like Amber Harrison and Simon Mulvany in recent times with the help of NSW Supreme Court judges.

Abuse of suppression orders in not confined to NSW judges. In Victoria they have the same problem and they are currently reviewing suppression orders because the judges are abusing them in a corrupt manner.

Conclusion

The fight for free speech and the freedom of political communication which the High Court handed down judgement on long ago is a battle still being waged.

The NSW Supreme Court which is meant to defend our rights to free speech and freedom of political communication is in effect one of biggest threats because it is selling out to people like Kerry Stokes and big business. But the battle lines have been drawn and many people like myself are standing up for our constitutional rights and freedoms. It would be nice if the court did the same for a change.

End of written submissions

By Shane Dowling – 14/5/2017