
IN THE HIGH COURT OF THE WESTERN CAPE

Mag.Crt: 14/1198/08 [17/1384/07]

CT.CAS: 1340/7/07 [Grg: 572/02]

Lara Johnstone	Applicant
And	
Magistrate Louw	First Respondent
Nat. Dir. Of Public Prosecutions ¹	Second Respondent
» Hon. Patricia de Lille, MP, ID	Third Respondent
» Mr. Thabo Mbeki, Former President	Fourth Respondent
» Mr. Bulelani Ngcuka, Former NPA Nat. Dir.	Fifth Respondent
» Mr. J.S. Selebi, Former SAPS Comm.	Sixth Respondent
» Mr. BM Skosana, Former Min. Corrections	Seventh Respondent
» Mr. Nelson Mandela, Former President	Eighth Respondent
Minister of Citizenship & Immigration, Canada	Ninth Respondent
Per: Deputy Attorney General of Canada	
Per: United Nations High Commissioner for Refugees	
Per: Consulate General of Switzerland, Capetown	
The Nobel Institute: Norwegian Nobel Committee	Tenth Respondent
Per: Royal Norwegian Consulate, Capetown	

Affidavit of Brad Blanton, Ph.D, evidencing the legal, psychological, and socio-political 'citizens privilege', Nuremberg Principles skills and competencies of Individual Responsibility, required for acts of civil disobedience to perceived illegitimate authority; and their application to the common law 'reasonableness test'; in terms of Criminal Procedure Act 51, of 1977: § 213: Proof of Written Statement by Consent; & § 171 & 172: Evidence on Commission

I the undersigned, Brad Blanton, being first duly sworn on oath deposes and says:

1. This affidavit is based on my personal knowledge, except where otherwise stated, and, if called upon to do so, I could and would competently testify to the matters herein stated.
2. I have a Ph.D degree in Psychology; I have been a clinical psychologist in Washington DC for 25 years.
3. I am the author of 1) Radical Honesty: How to Transform Your Life by Telling The Truth; 2) Practicing Radical Honesty: How to Complete the Past, Stay in the

¹ See: *State v. Johnstone: Legal Argument, 11 August 2009: Legal Argument: Facts Not In Dispute*: (I) At 15:23; 15:32 and 18:32 hrs, on 10 July 2007, the Defendant sent three SMS's to the Plaintiff; for the attention of: (i) Mr. Thabo Mbeki, (ii) Mr. Bulelani Ngcuka, (iii) Mr. J.S. Selebi, (iv) Mr. B.M. Skosana, (v) Mr. Nelson Mandela, and (vi) Mrs. Patricia de Lille; all c/o Plaintiff¹, in her capacity as *Non Sub Judice Executive, Opposition Party*; (II) At 10:23 and 11:32 hrs on 16 July 2007, the Defendant sent two SMS's to the Plaintiff; for the attention of (i) RSA Legislature; (ii) RSA Judiciary; (iii) RSA Executive Officials; all c/o Plaintiff¹, in her capacity as *Non Sub Judice Executive, Opposition Party*

Present and Build a Future with a Little Help From Your Friends, 3) Honest to God: A Change of Heart that can Change the World with Neil Donald Walsh, author of the Conversations with Good books; 4) Radical Parenting: Seven Steps to a Functional Family in a Dysfunctional World; 5) The Truth-tellers: Stories of Success by Radically Honest People and 6) my biography, A New Kind of Trailer Trash.

4. I am the founder and currently the President and CEO of Radical Honesty Enterprises SparrowHawk Book Publishing, the founder and board member of the Center for Radical Honesty, a non-profit corporation.
5. I have been developing and conducting the Course in Honesty eight day residential workshop, The Power of Honesty three day residential workshop and the Course in Honesty in the World, five day residential workshop for a number of years and now conduct an annual trainers training to teach people to conduct the workshops. You can find out more by visiting www.radicalhonesty.com.
6. I was a Candidate for Congress of the United States from Virginia in 2004 and 2006. I am the Pope of the Radical Honesty Futillitarian Church.
7. Lara read one of my books, contacted me in 1999, attended some of my programs, worked for me briefly and has corresponded with me via email since then.
8. Lara and I were arrested together while protesting campaign finance corruption in the Rotunda of the Capital Building in Washington DC in January of 2000. It was a non-violent protest and we were jailed for less than six hours. If you are interested, the story and purpose of that action, is in my report for the second time I was arrested for the same cause a month later. It is in my book co-authored with Neil Donald Walsch, Honest to God: A Change of Heart that can Change the World.
9. Lara is pissed off about abusive lying and withholding authorities who get by, by withholding, secrecy and hiding what they do in the name of national security and so am I. I don't know if Lara would ever be violent or not, but she hasn't been so far as I've known her, about ten years.
10. She has worked hard to demand fairness and to oppose inequality among people.
11. Lara has told me that she is the Defendant in criminal court proceedings, regarding Political Necessity/Civil Disobedience 'crimen injuria'² text messages³, she sent to some politicians⁴, at 15:23; 15:32 and 18:32 hrs, on 10 July; and at 10:23 and 11:32 hrs on 16 July 2007; which are alleged to be 'insults to the dignity' of the Politicians.
12. Lara has also told me that she has submitted the following Political Necessity: Civil Disobedience & the Nuremberg Principles: Freedom of Speech: Radical Hon(our)sty

² **Crimen Injuria & Reasonableness:** a fundamental prong of determining the unlawfulness of Crimen Injuria, is what is called 'the criterion of reasonableness'. This is an objective test; and it requires the conduct complained of to be tested against the prevailing norms of society, in order to determine whether such conduct can be classified as wrongful.

³ SMS @ 15:23 hrs, on 10 July 2007: [*Be My Guest Kaffir! Quote SAP George Case 572-02, U Kaffir Moron Imbecile*] SMS @ 15:32 hrs on 10 July 2007: [*U r 1 stupid dumb kaffir bitch. Don't u fucking dare say I didn't warn u, u goddamn kaffir hypocrite! Lara Johnstone*] SMS @ 18:32 hrs on 10 July 2007: [*As usual u gutless 2faced hypocrite coloured kaffir imbecile, U r all talk & no action. SAP # 572/02 U rotting excuse 4 a brain!*] SMS @ 10:23 hrs on 16 July 2007: [*So Your Message to JAG is: "FUCK U, FUCK STARH, & AIDS IS A 5* KAFFIR DIE B/W DEPOP'N PROGRAM. BEST INVENTION SINCE 'MANHATTEN', USURY, RAPE & TORTURE'?"*] SMS @ 11:32 hrs on 16 July 2007: [*Press Release: PDLille 2 LJohnstone: "FUCK U, FUCK STARH, & AIDS IS A 5* KAFFIR DIE B/W DEPOP'N PROGRAM. BEST INVENTION SINCE 'MANHATTEN, USURY, RAPE & TORTURE'"*]

⁴ Lara Johnstone: "The factual truth:. I sent the SMS's to six tough South African politicians, c/o the Primary Plaintiff, who: (i) I had been dealing with on this issue, since 2002; spoken to, written dozens of documents, including documents wherein I defined what I mean, when I use the word "Kaffir", (ii) I had spoken to 15 minutes before I sent her the 'crimen injuria' SMS's, for her forwarding, where we had a heated discussion, which was finally terminated by her with the words "Fuck Your [Legal Military] Document. Fuck Your Racist Conspiracy Theories about the [Manmade Biological Warfare] Origins of AIDS; and Fuck You!"

'Offer of Proof' documentation, into the court record, on 08 July and 12 August 2009, in written and DATA DVD format:

- A. Political Necessity: Freedom of Speech, Radical Hon(our)sty & Civil Disobedience
- B. Dr. Susan Blackmore, *Waking from the Meme Dream*⁵, on the neuroscience studies, that conclude that there is no-one inside the brain, no central controller, no decision-maker;
- C. Erich Fromm, *To Have or To Be, and The Sane Society* on the pathology of normalcy, religion and character; in terms of Having vs. Being;
- D. The Work of Stanley Milgram, excerpt from *Practicing Radical Honesty* [Having/Obedience to Authority] vs. [Being/Rebellion];
- E. The Sufi Levels of Consciousness, excerpt from *Practicing Radical Honesty*;
- F. The Work of Stanley Milgram & *Suffering as Attachment to Belief*, by Dr. Brad Blanton
- G. *Practicing Radical Honesty: Being Specific About Anger and Forgiveness*⁶: (P:38)
- H. Video⁷: PRH: *Beyond Good and Evil* (00:39); PRH: Brad Blanton for NWO President (07:25) and Brad Blanton for Congress (09:38); PRH: *Interpretations of Language* - Brad Blanton (00:57); PRH: *Radical Honesty I* (03:44); *II* (03:23); *III* (04:23)
- I. Video⁸: *Obedience to Authority* - Stanley Milgram (44:33) and *Sundance* (03:14);
- J. Video⁹: *Politically Correct/Soft Language* - George Carlin (06:56)
- K. Video¹⁰: *Disobedience to War: Sir!, No Sir! 6/6* (David Zeiger)

Definitions & Clarification of Terminology:

13. Use of civil disobedience and Political Necessity, is in accordance to interpretations expressed in *Civil Disobedience and the Necessity Defence*, by John Alan Cohen, *Pierce Law Review*:

CIVL DISOBEDIENCE AND NECESSITY:

Freedom of expression in a free society includes freewheeling public dissent on controversial political issues of the day. Civil disobedience is a form of protest that, while usually peaceful, involves violating the law—usually by trespassing on government property, blocking access to buildings, or engaging in disorderly conduct. Civil disobedience has been called “the deliberate violation of law for a vital social purpose.”

In their day in court, civil disobedients have at times sought to interpose the necessity defense to justify their conduct. The necessity defense asserts that breaking the law was justified in order to avert a greater harm that would occur as a result of the government policy the offender was protesting.

Protestors will seek to invoke the necessity defense not so much to gain acquittal from the relatively minor charges, but to advance the more important objective of publicly airing the moral and political issues that inspired their act of civil disobedience. There is the hope of gaining notoriety for a cause by discussing it in court, and “educating” the jury about political grievances or other social harms. The strategy is meant to appeal to a higher principle than the law being violated—the necessity of stopping objectionable government policies—and to let the jury have an opportunity to weigh their technically illegal actions on the scales of justice. Acquittal is of course hoped for in the end but may be quite low on the protestors’ list of priorities.

⁵ *Waking from the Meme Dream*, Paper presented at the Psychology of Awakening: International Conference on Buddhism, Science and Psychotherapy, at Dartington, 7 – 10 November 1996, Dr. Susan Blackmore of the Dept. of Psychology, Univ. of West England

⁶ <http://www.scribd.com/doc/16203475/090606Population-Policy-Common-Sense-Exponential-Functions-The-Laws-of-Sustainability>

⁷ <http://crimeninuria.blogspot.com/2009/08/1a-11-aug-data-dvd-12-alternative.html>

⁸ <http://crimeninuria.blogspot.com/2009/08/1a-11-aug-data-dvd-12-alternative.html>

⁹ <http://crimeninuria.blogspot.com/2009/08/1a-11-aug-data-dvd-12-alternative.html>

¹⁰ <http://crimeninuria.blogspot.com/2009/08/1a-11-aug-data-dvd-22-07-05-23.html>

The necessity defense is attractive to reformers who practice civil disobedience because it allows them to deny guilt without renouncing their socially driven acts. It offers a means to discuss political issues in the courtroom, a forum in which reformers can demand equal time and, perhaps, respect.

Moreover, its elements allow civil disobedients to describe their political motivations. In proving the imminence of the harm, they can demonstrate the urgency of the social problem. In showing the relative severity of the harms, they can show the seriousness of the social evil they seek to avert. In establishing the lack of reasonable alternatives, they can assault the unresponsiveness of those in power in dealing with the problem and prod them to action. And in presenting evidence of a causal relationship, they can argue the importance of individual action in reforming society. Thus, the elements of the necessity defense provide an excellent structure for publicizing and debating political issues in the judicial forum.

The goal of describing their political motivations to the jury, and implicitly to the media, is subject to numerous hurdles inherent in the necessity defense. In most instances, as we will see, courts will rule as a matter of law that the actors have failed in the offer of proof regarding the elements of the necessity defense so that the jury rarely is given the chance to weigh in on the matter. On the other hand, if the defense is allowed, the jury is called upon to weigh controversial political issues and to function as the "conscience of the community."

"Reflected in the jury's decision is a judgment of whether, under all the circumstances of the event and in the light of all known about the defendant, the prohibited act, if committed, deserves condemnation by the law." In cases where judges have been persuaded to allow the necessity defense, juries have, often enough, delivered not guilty verdicts.

A. Definition of Civil Disobedience

John Rawls defines civil disobedience as "a public, non-violent, conscientious yet political act contrary to law usually done with the aim of bringing about a change in the law or policies of the government." A more comprehensive definition of civil disobedience is:

Civil disobedience is an act of protest, deliberately unlawful, conscientiously and publicly performed. It may have as its object the laws or policies of some governmental body, or those of some private corporate body whose decisions have serious public consequences; but in either case the disobedient protest is almost invariably non-violent in character.

Broadly construed, civil disobedience may be directed toward a law or policy of the government, or toward a corporate entity whose policy is the subject of protest. Civil disobedients hope that their conduct makes a dramatic appeal to the conscience of the community, affects public awareness of a particular social issue, and motivates citizens to demand change in certain policies.

Civil disobedience is a singular hallmark of a free country:

We must recognize that civil disobedience in various forms, used without violent acts against others, is engrained in our society and the moral correctness of political protestors' views has on occasion served to change and better our society. Civil disobedience has been prevalent throughout this nation's history extending from the Boston Tea Party and the signing of the Declaration of Independence, to the freeing of the slaves by operation of the Underground Railroad in the mid-1880's. More recently, disobedience of "Jim Crow" laws served, among other things, as a catalyst to end segregation by law in this country, and violation of selective service laws contributed to our eventual withdrawal from the Viet Nam War.

Civil disobedience differs from other forms of peaceful protest in that there is a technical violation of the law such as trespass, blocking of public access, or disorderly conduct; and the violation is part of the effort to garner public attention to the cause. Ordinary forms of peaceful protest may simply involve peaceful picketing, circulating petitions, forming of rallies, and the like, in which proper police permits are obtained and there are no violations of the law.

14. Use of 'citizens privilege' and Nuremberg Principles, is in accordance to interpretations expressed in *Civil Disobedience and the Necessity Defence*, by John Alan Cohen, *Pierce Law Review*:

CIVIL DISOBEDIENCE BASED ON THE NUREMBERG PRINCIPLES:

The Allied Powers codified the Nuremberg Principles as international law at the end of World War II. On August 8, 1946, the United States, the Soviet Union, France, and Great Britain signed an Agreement for the Establishment of an International Military Tribunal, known as the London Charter, to try persons charged with war crimes. The London Charter sets forth definitions for crimes against peace, crimes against humanity, and war crimes.

To civil disobedients, article 6 of the London Charter is of particular interest in that it holds individuals personally responsible for, among other things, "planning, preparation, initiation or waging of a war . . . in violation of international treaties, agreements or assurances." Under the London Charter, it is not a defense to individual responsibility that an individual acted under superior orders. The notion of individual responsibility, which forms the core of the Nuremberg Principles, applies not only to government officials, policy makers, and military personnel, but to private citizens as well. Individual responsibility depends "on the extent of complicity as reflected in actions and knowledge." The strategy to civil disobedients is to argue that their actions were designed to prevent others from violating the law embodied in the Nuremberg Principles. It has been persuasively asserted that the application of the Nuremberg Principles in domestic courts is entirely proper, and that indeed courts have a duty to apply them.

The defendants will then seek to assert that they acted "to prevent the commission of a crime about to be committed or to prevent the consummation of a crime already underway. . . ." They will seek to justify the action based on the common law privilege of using reasonable force to prevent a crime that is being committed or is about to be committed in their presence. This privilege to use force to prevent the commission of a crime is summarized as follows: "One who reasonably believes that a felony, or a misdemeanour amounting to a breach of the peace, is being committed, or is about to be committed, in his presence may use reasonable force to terminate or prevent it." Perkins and Boyce articulate the privilege this way: "[A]ny unoffending person may intervene for the purpose of preventing the commission or consummation of any crime if he does so without resorting to measures which are excessive under all the facts of the particular case." Most jurisdictions in the United States recognize this privilege to use force to prevent crime. This defense, sometimes referred to as the "citizen's privilege," requires only that the defendants have a "reasonable belief that an ongoing or imminent violation of . . . law is occurring." Thus, if the defendants are reasonable in their belief, but mistaken, the defense may still be asserted.

In *Chicago v. Streeter* eight demonstrators were charged with trespass in connection with a protest at the Chicago office of the South African Consulate. The court allowed the jury to hear evidence that the actions of the defendants were necessary to prevent violations of international law under the Nuremberg Principles. The accused argued that the government of South Africa had been committing crimes by its policies of racial segregation and that the defendants acted reasonably in their efforts to prevent the continuation of these crimes. All defendants were acquitted.

15. Use of 'reasonableness test' is in accordance to *Essex Fire Service Safety Partnership's Legal: Common Law Definition of Reasonable Test and Bolam v. Friern Hospital Management Committee* [1957] 1 WLR 582; [1957] 2 All ER 118:

Generally, the standard of care/foresight a person is expected to attain is an objective standard derived from what a reasonable person would do under the same circumstances. 'Where you get a situation which involves the use of some special skill or competence, then the test...is not the test of the man on the top of a Clapham omnibus, because he has not got this special skill. The test is the standard of the ordinary skilled man exercising and professing to have that special skill.'

'The man on the Clapham omnibus', is in legal speak, 'the reasonable person'. This is a phrase that was first used by Sir Charles Bowen, QC (later Lord Bowen). (Brewer's Dictionary of Phrase & Fable, 16th Edition, 1995) The man on the Clapham omnibus/the man in the street means the average ordinary English person (Oxford Guide to British & American Culture, 1999)

Bolam -v- Friern Hospital Management Committee [1957] 1 WLR 582; [1957] 2 All ER 118: Professional Negligence: "Where some special skill is exercised, the test for negligence is not the test of the man on the Clapham omnibus, because he has not got this special skill. The test is the standard of the ordinary skilled man exercising or professing to have that special skill."

16. The 'social contract' is a socio-political and legal agreement between citizens and government. For the purpose of this matter, a healthy social-contract exists, when men and women in government respect the rights of its people, by guaranteeing and, in fact, encouraging their right to speak out, to criticize irresponsible leadership, and to hold their government accountable for its failures and actions.

State & Defendants Arguments:

17. The State's argument is that the Defendants civil disobedience acts, should be judged in terms of whether the man on the Clapham omnibus considers the defendants actions of civil disobedience 'reasonable' or not; and if unreasonable, accordingly 'unlawful'.
18. The Defendant argues that Stanley Milgram's studies on Obedience, demonstrate that actions of civil disobedience, to perceived illegitimate authority, require certain emotional, psychological, legal and political skills and competencies that the man on the Clapham omnibus lack; and accordingly the reasonableness test to be applied is not that of the man on the Clapham omnibus, but the test of the ordinary skilled person exercising and professing to have that particular special skill.

Brief Description of the Milgram Experiment:

19. The Milgram experiment was a series of social psychology experiments conducted by Yale University psychologist Stanley Milgram, which measured the willingness of study participants to obey an authority figure who instructed them to perform acts that conflicted with their personal conscience.
20. Milgram devised the experiments in response to the question raised by Hannah Arendt, in her coverage of the war crimes trial of Adolf Eichmann. Eichmann's defence was that he should not be held personally responsible for a crime against mankind because he was doing his duty in the social system of which he was a part. His lawyers said a court might judge the social system as criminal, but not he person doing their duty within that social system. This argument was rejected. Eichmann's adjudicators concluded that he was individually responsible for the crimes he committed, regardless of the social system of which he was a part, and he was executed.
21. Arendt then raised the question which fascinated Milgram: Was Adolf Eichmann some unusual deviant, some sadistic exception to common humanity, or was he just a bureaucrat? What he actually did was shuffle papers in an office and make phone calls and give orders. Was he normal?
22. The Milgram experiment was designed to simulate the conditions in which Eichmann operated, and to determine how many individuals would - like Eichmann - follow orders and be obedient to the system in which they operated; and how many would practice civil disobedience and refuse to be obedient to perceived illegal authority. Milgram's experiment revealed that a significant majority of the population - 65%, like Eichmanns

millions of accomplices - merely follow orders, irrespective whether the orders violate their deepest moral beliefs; only 35 % possessed the skills and competencies for civil disobedience.

23. Furthermore, when individuals could share the responsibility or blame, with just one other person, 92% of individuals would, like Eichmann, cooperate with authority; and refrain from civil disobedience; and only 8% possessed the skills and competencies for civil disobedience.
24. In Perils of Obedience, Yale and Harvard University social psychologist, Dr. Stanley Milgram summarised his 'Eichmann' Obedience experiment, as follows:

"The legal and philosophic aspects of obedience are of enormous importance, but they say very little about how most people behave in concrete situations. I set up a simple experiment at Yale University to test how much pain an ordinary citizen would inflict on another person simply because he was ordered to by an experimental scientist. Stark authority was pitted against the subjects' [participants'] strongest moral imperatives against hurting others, and, with the subjects' [participants'] ears ringing with the screams of the victims, authority won more often than not. The extreme willingness of adults to go to almost any lengths on the command of an authority constitutes the chief finding of the study and the fact most urgently demanding explanation. Ordinary people, simply doing their jobs, and without any particular hostility on their part, can become agents in a terrible destructive process. Moreover, even when the destructive effects of their work become patently clear, and they are asked to carry out actions incompatible with fundamental standards of morality, relatively few people have the resources needed to resist authority."
25. The relevant questions then become, what are the resources: the emotional, psychological, and socio-political skills and competencies, that:
 - A. the 37% possess, when individually confronting perceived illegal authority; and
 - B. the 8% possess, refusing the given opportunity, from an ideological or social peer, to share the blame, with them; and individually confront perceived illegal authority.
26. Briefly, those skills and competencies would range from cognitively consciously comprehending an instruction to commit an illegal act from a perceived illegitimate authority; finding an excuse to avoid committing the illegal act; refusing to commit the illegal act; personally confronting the authority as illegitimate; reporting the authority's illegal acts, to relevant authorities.
27. The results of the Stanley Milgram Tests on Obedience (which have since been replicated by other social-scientists with the same results) clearly show that acts of civil disobedience are acts that the man on the Clapham omnibus are emotionally, psychologically and socio-politically incapable of. Put differently they are acts that require the use of special emotional, psychological and socio-political skills and competencies.
28. To apply the man on the Clapham omnibus reasonableness test, to someone consciously and deliberately committing an act of civil disobedience to perceived illegal authority; would be the same as applying the man on the Clapham omnibus reasonableness test, to determine whether a heart surgeon's decisions and actions made during open-heart surgery, were negligent or unreasonable; or asking a clown, whether an astronaut's decisions during lift-off, were 'reasonable' or not.
29. Consequently, the reasonableness test that should be applied to cases of civil disobedience, are not those of the man on the Clapham omnibus; because he does not

have these special skills and competencies. The reasonableness test that should be applied, is the standard of the ordinary skilled person, exercising and professing to have that special skill.

30. Lara submits that any reasonable person, with 37% or 8% (Milgram speak) skills and competencies, would have asked themselves some of the following questions, in evaluating her Political Necessity and Radical Hon(our)sty 'criminal acts'. I agree.
31. To determine the reasonableness of Lara's alleged criminal 'civil disobedient' act, individuals with the legal, political, etc. skills and competencies, would need to determine the reasonableness, or not, of Lara's political necessity 'Offer of Proof' allegations, which motivated her 'civil disobedient' criminal act.
 - A. They would evaluate questions such as: Civil Disobedience in South Africa:
 - I. Is South Africa a democratic country, which accordingly considers civil disobedience one of its hallmarks?
 - II. If so: was Lara's criminal act, an act of Civil Disobedience: i.e. "a public, non-violent, conscientious yet political act contrary to law usually done with the aim of bringing about a change in the law or policies of the government"?
 - B. If so, did her Offer of Proof, to plead to the Political Necessity Defence, provide sufficient 'Offer of Proof' to justify the invocation of her Defence? Did her 'Offer of Proof' show:
 - I. She broke the law in order to avert a greater harm that would occur as a result of the government policy she was protesting?
 - II. She broke the law to advance the more important objective of publicly airing the moral and political issues that inspired her act of civil disobedience?
 - III. Her hope to gain notoriety for her cause by discussing it in court, and "educating" the 'jury' about political grievances or other social harms?
 - IV. Her appeal to a higher principle than the law being violated, the necessity to stop objectionable government policies?
 - V. Her hope to let the 'jury' have the opportunity to with her technically illegal actions on the scales of justice?
 - VI. She denied guilt without renouncing her socially driven acts?
 - VII. She plead to necessity to discuss political issues in the court room, a forum where she could demand equal time and, perhaps, respect?
 - VIII. Proof of the possibility of the imminence of the harm, to demonstrate the urgency of the social problem?
 - IX. The relative severity of the harms, thereby attempting to show the seriousness of the social evil she seeks to avert?
 - X. The lack of reasonable alternatives, so that in pleading to necessity, she may assault the unresponsiveness of those in power in dealing with the problem and thereby prod them to action?
 - XI. Evidence of a causal relationship, so that in pleading to necessity, she may argue the importance of individual action in reforming society?
 - C. Was her Offer of Proof accepted, by the court?
 - D. If so, was she granted the opportunity to invoke the Political Necessity Defence; and to call the expert witnesses to provide their expert witness testimony to the issues that motivated her civil disobedient act?

32. To determine the reasonableness of Lara's alleged criminal 'civil disobedient' Free Speech: Radical Hon(our)sty Cultural Religious act, individuals with the legal, political, etc. skills and competencies, would need to determine the reasonableness, or not, of Lara's Radical Hon(our)sty Cultural Religious practice:
- A. Were her alleged criminal acts, a result of her Radical Honesty cultural religious practice, such as:
 - I. Was her act a general attitude of disrespect for the minds of the plaintiffs, including her own?
 - II. Does Lara consider her mind to be who she is?
 - III. Does Lara consider the Plaintiff's mind to be who she is?
 - IV. Or, does Lara consider the Plaintiff's being who grew the mind, the one who notices first and learns second, the observer-in-the-moment-alive-right-now-only being, to be who she is?
 - V. Is Lara a fully alive, healthy person who raises hell all the time, is not polite, offends people, hurts people's feelings, and also stays with people while they work through the feelings, committed to their being and at war with their minds?
 - VI. Does she refuse to submit to the minds of others or even to her own mind?
 - VII. Does she rule her own life and create a life from being, which is to say, out of love, using her mind, not being used by it?
 - VIII. For the love of being, does Lara choose to be a destroyer of minds, incessantly, endlessly, and perhaps fruitlessly, but it is her own sweet damned choice?
 - IX. Is Lara's Radical Honesty Religious Map and Religious Attitude (Fromm: To Have or To Be), that of being courageous enough to express her truth, her whole truth, and nothing but her truth, to the person she is in disagreement with, to their face, not behind their back, with the commitment to remain in the conversation, with them; until sensate forgiveness has sincerely occurred?
 - X. If it is so determined that Lara's Radical Honesty Religious Map and Attitude, is as aforementioned, would it not be impossible for Lara to have formed the mens rea intention to insult the Plaintiff; since her intention was to respect the Plaintiffs being, while being at war with the Plaintiff's mind; and to remain in the conversation until sensate forgiveness had sincerely occurred?
 - B. Were her alleged criminal acts, a result of her Bushi Honourable Way of the Warrior cultural religious practice, such as:
 - I. Was her act partially motivated by her loathing of underhand dealings and crooked undertakings?
 - II. Was her act motivated to intellectually engage and the Plaintiffs in an exploration of knowledge and character?
 - III. Ultimately was her act motivated to experientially engage the Plaintiffs in an exploration of Co-Creating a Radical Honesty Truth and Forgiveness Social Contract for South Africa
 - C. Were her alleged criminal acts, a result of her Dischordian cultural religious practice:
 - I. Was her act an Operation Mindfuck: Golden Apple Seed Mission (OMGASM): Meme Hack?
 - II. Did her Operation Mindfuck - an act of deliberate hyperbole and exaggeration -- manifest as a decentralized campaign of civil disobedience, activism, culture hacking, reality hacking or anything else that is believed to bring about social

change through disrupting paradigms and thus forcing the victim to question the parameters of her reality tunnel?

- III. If a meme is a contagious idea -- like for example, the word 'kaffir' -- that replicates like a virus, passed on from mind to mind; and memes function the same as genes and viruses do; propagating through communication networks and contact between people; did her meme hack take the existing meme 'kaffir'; and alter it, to express a point of view not intended or inherent in the original, or even opposite to the original; and thus show the unreasonable and arbitrary nature of the 'kaffir' meme?

33. As a 'reasonable' Radical Honesty Politician, Psychologist, Activist and Pope, I think that:

- A. The law Lara is being prosecuted for is ridiculous and dates back to a belief in curses from witch doctors.
- B. Even though Lara is, like me, crazy and always asking for trouble, she is being ridiculously prosecuted, and her defence is justified and accurate and her opinion that there is a significant difference between posed forgiveness and real forgiveness is entirely accurate and, so far, almost always avoided by politicians.
- C. This trouble Lara is making, is good trouble to make.
- D. There is a difference between posed, fake intellectual forgiveness, and sincere, sensate being forgiveness:

Forgiveness occurs through telling the truth and then staying there to experience the sensations in the body and the emotional response of the person speaking the truth. Staying present to the experience requires a broadening of attention, a widening of focus from the narrower focus on right and wrong, admitting lies, admitting crimes, reporting what really happened in the past. The shift from primary attention to the intellectual domain of judging right and wrong, to giving primary attention to the bodily experience that comes with telling the truth, is so that the person can feel their way through, rather than think their way around, the experience triggered by the report about the past.

Forgiveness is required for reconciliation. And the process of reconciliation is forgiveness squared. Because, as the one who initiates telling the truth, whether it is confessing what you have done or reporting on what others have done, you have to stay present to the persons who responds to your words, and to your feeling response and verbal response to them, and they must do the same in response to you...and this must go on for however long it takes for all the parties to be moved in their emotions, in their bodies and at the level of sensations experienced in the body, so that the sensations can increase, persist for a while, decrease, and then recede and go away. It is this bodily sensation of a change of heart that is the criterion for forgiveness that creates the possibility of reconciliation. If this process goes on honestly and is supported by those who give the invitation to reconciliation, sometimes former enemies become allies and friends out of mutual respect for each other's willingness to go through the process of telling the truth and experiencing and sharing their honest heartfelt, bodyfelt response.

Sometimes, many times, the truth never gets told. Sometimes, many times, even if the truth is told, reconciliation does not occur.

Sometimes truth and reconciliation happens. When it does, new people make a new beginning."

34. I declare under penalty of law that the foregoing is true and accurate.

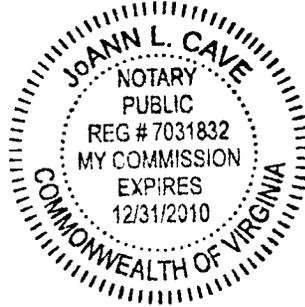
Brad Blanton Ph.D

Brad Blanton, Ph.D,
State of Virginia, USA

Subscribed to and sworn to before me, this 2nd day of ~~October~~ ^{December}, 2009.

Notary Seal:

JoAnn L. Cave
[Signature of Notary]



JoAnn L. Cave
[Typed/Script Name of Notary]
NOTARY PUBLIC

My Commission expires: 12/31, 2010.

Signed before me
on December 2nd 2009
In the state of
Virginia
County of Page