

ONTARIO

SUPERIOR COURT OF JUSTICE

(Toronto Small Claims Court)

BETWEEN:



SOHEILA AMINTORABI also known as SHADI AMIN

Plaintiff

-and-

ARSHAM PARSİ also known as ALIREZA ABRISHAMI

Defendant

Counsel for the Plaintiff: Mr. W. C. Wanless

Counsel for the Defendant: Mr. B. Amouzgar and Mr. M. Evans

REASONS FOR DECISION

[1] This is a case of alleged serious, sustained and baseless defamation of the plaintiff on the internet. I must decide whether some or all of the articles and messages refer to the plaintiff, whether they are defamatory, and then, for the majority, whether they were published by the defendant. Only two of the common law defences were advanced by the defendant at trial, fair comment and responsible communication on a matter of public interest. Others were pleaded and referenced in passing but not pursued in closing argument.

Introduction

[2] The plaintiff is an Iranian refugee and is known as Shadi Amin. That is how I will refer to her in these reasons. The defendant is an Iranian refugee and is known

as Arsham Parsi. That is how I will refer to him in these reasons. Both are members of the LGBT community and both actively work with other LGBT refugees, particularly those from Iran, where, I was told, the ultimate penalty of the State for being LGBT is execution.

[3] It is the plaintiff's allegation that eight articles and messages are defamatory of her. Five of these were published on a web site justice4lgbt.com. The defendant denies he has any involvement with that web site or that he is responsible for authorship or publication. One is Facebook messages by Mr. Parsi to Ms. Homily, a friend of Ms. Amin. One is a "refugee letter" published on a web site known as Khodnevis on the day Mr. Parsi was a guest editor. This is also one of the five on the web site justice4lgbt.com. One is an e-mail sent to Amnesty International by an address associated with justce4lgbt.com. All are in the Farsi language, with the exception of the e-mail to Amnesty International. The English translations and the email are attached to these reasons. I appreciate the assistance of both counsel in providing me with electronic versions so that I can attach them.

[4] There were some challenges to the English versions during the course of the trial. Both translations were done by certified translators, but neither party called an expert in Farsi to testify. For the most part the differences were not significant, except for certain words, which I will specifically refer to later in these reasons.

[5] The plaintiff claims general and aggravated damages of \$25,000.00.

The plaintiff's claim

[6] Ms. Amin is a resident of Germany and travels extensively, including to Canada. She left Iran in 1984 due to her political activity. Eventually she travelled to Germany where she successfully claimed refugee status.

[7] Presently she is working as a manager of an organization called 6Rang which is a lesbian and transgender network. She is also one of the coordinators of Justice for Iran, which is a human rights organization.

[8] Ms. Amin is an author and has appeared many times on television discussing gender and human rights issues.

[9] On the second day of trial Ms. Amin testified that the website justice4lgbt.com was still active that very morning and all of the blog posts that are in issue in this action are still on that website.

[10] Ms. Amin testified that the first time people started to write about her in a defamatory way, was after the publication of an article in an online magazine known as Khodnevis on the day Mr. Parsi was the guest honorary editor. This was May 17, 2015. People sent the article to her and said that it was about her, even though she is not mentioned by name.

[11] Ms. Amin claimed in her evidence that justice 4lgbt.com is only about her and events in Iran and includes multiple pictures of her and her colleagues and articles about her.

[12] Counsel for Ms Amin took Ms. Amin to each of the alleged defamatory documents. He began with the document headed “BBC researcher has criminal record but no diploma”.¹ It is dated November 21, 2015 and appeared on the justice4lgbt website. It contains a picture of Ms. Amin. I take one line as an example only from the article, which states “But why is it that the road has been cleared for Ms. Soheila Amintorabi to step foot into the BBC again? And this is after the recent scandals with voluminous financial files, money laundering and documented cases of verbal, physical, and sexual violations”. The author is anonymous.

[13] The plaintiff claims that the entire article is defamatory of her. Ms. Amin testified that she found this article to be extremely hurtful and that none of the allegations in the article are true.

[14] The next article is headed “Report: do you even censor Wikipedia?”.² It is dated June 10, 2015 and appears on the website of justice4lgbt.com. The article makes reference to Ms. Amin. It contains information that is inaccurate, such as alleging Ms. Amin was married at the age of 14, but contains one sentence that is alleged to be defamatory of her. It is as follows “what financial and nonfinancial activities have you hidden under this name that you do not want to be disclosed?”. Further the plaintiff claims that the article suggests she is hiding her identity, which is untrue, and is alleged to be defamatory of her. The author is anonymous.

¹ See attached as Schedule A

² See attached as Schedule B

[15] The next article is headed “New mail in: you are a homophobe and anti-male, Ms. Amin”.³ It is dated June 23, 2015 and appeared on the website of justice4lgbt.com. It contains a picture of Ms. Amin. The headline alone is alleged to be defamatory of Ms. Amin. The plaintiff claims that the entire article is defamatory of her. Again, I take just one line as an example as follows “Ms. Amin, how far does proving and disproving of yourself go? To what lengths are you willing to go to create a climate of fear and divide among members of the community? The very individual who questions policies of the Islamic Republic of Iran and labels those who are criticizing her as pets of the Islamic Republic of Iran, has been walking closely in the footsteps of the very Islamic Republic of Iran”. The author is anonymous.

[16] Ms. Amin testified that she believed the writer of this article is attempting to destroy her relationship between herself and gay people by suggesting that she has hatred towards men and bisexuals. The article also repeats the allegation that Ms. Amin is involved in a financial scandal. None of these allegations are true according to Ms. Amin.

[17] The next article is headed “A homosexual asylum seeker: our rights are a toy in the hands of some human rights activists”.⁴ It is dated June 5, 2015 and appeared in both Khodnevis on the day Mr. Parsi was the guest editor, and later on the website justice4lgbt.com. The article does not mention Ms. Amin. The article appears to have been written by someone seeking refugee status in Turkey. Ms. Amin testified that she believes Mr. Parsi was the person responsible for publishing the article on Khodnevis and subsequently on the web site justice4lgbt.com.

[18] Ms. Amin testified that anyone who knows the Iranian LGBT community and their organizations or activists would have a picture of all of the activists and organizations organizing workshops and courses in Turkey which are referenced in the article. Ms. Amin testified that the organization 6Rang is active in organizing workshops and activities in Turkey.

[19] The article refers to the author’s decision to attend a class. The class, according to the article, is organized by an organization and its manager who constantly appeared on Persian televisions stationed abroad as human rights lawyers and activists. Ms. Amin testified that this is a reference to her as she frequently

³ See attached as Schedule C

⁴ See attached as Schedule D

appears on Persian televisions stationed abroad. Ms. Amin also referenced the allegation in the article that a counselling session that was supposed to be private was filmed. Ms. Amin testified that she does ask participants to be filmed, but only does so with consent. I will return to the question of whether the article is about Ms. Amin, and if so whether it is defamatory of her.

[20] The next article was originally published on June 8, 2015 in Farsi on the website justice4lgbt. It was then reposted in English on November 23, 2015. It is titled “That bed with purple cover and coloured walls”.⁵

[21] This article does not mention Ms. Amin by name. It is this article that resulted in a discussion between counsel over two words in Farsi. The first is the word ‘tajavos’. The plaintiff alleges that this word when translated to English means “rape”. The defendant alleges that the word translates into English to “aggression” or “violation”. Ms. Homily, who testified on behalf of the plaintiff, testified that the word means rape and I am satisfied that this is the correct translation taken in the context of the article. The other word is ‘ouu’ which has been translated as “she” in the translated article. The defendant argued that this is actually a neutral term in Farsi, but I am satisfied that, based on the testimony, in the context of the article the correct translation is “she”.

[22] The author of the article is once again anonymous and alleges that someone had an intimate relationship with the author and then goes on to allege that the relationship was rape. Ms. Amin in her evidence alleged that the article is a clear reference to her.

[23] The article also references that the subject of the article is “not a good comedian.”. Ms. Amin testified that one of her hobbies is stand-up comedy. The article is about a lesbian who is a responsible person in an organization. Again Ms. Amin alleges this is a reference to her. I accept the evidence of Ms. Amin and for reasons set out later, accept that this article is a reference to her.

[24] The next document alleged to be defamatory is an email to two individuals at Amnesty International and is said to be from Dr. Miremad Tabandeh at justice4lgbt.⁶ It is dated August 11, 2015. The email complains of a conflict of interest of an employee at Amnesty International, due to that person’s close relationship with the plaintiff. This email was also published on the justice4lgbt website. Ms. Amin

⁵ See attached as Schedule E

⁶ See attached as Schedule F

testified that she had made several efforts to try and establish if the alleged author existed and was unsuccessful.

[25] Amnesty International forwarded a copy of the email to the plaintiff. The email alleges that “we have published a lot of reports and letters that they received from Iranian LGBT community members on the wrongdoing of Ms. Amintorabi and Sadr, their abuses, rape, bullying and money laundering and etc.”. This is a repetition of the previous allegations.

[26] Ms. Amin testified about the impact these various articles had on her. It was not easy to answer because she was being called a rapist on an anonymous site. She had to explain a lot about her life to others. The articles have impacted the trust she held in her community.

[27] The final publication alleged to be defamatory is a series of Facebook messages between Mr. Parsi and Ms. Homily.⁷ Ms. Homily testified on behalf of the plaintiff. Mr. Parsi admits he is the author of his messages. The issues are whether these messages are about Ms. Amin and whether they are defamatory of her. Even if I find in favour of the plaintiff on both, the publication was only to Ms. Homily.

[28] Ms. Homily was a political prisoner in Iran. She is now an activist in human rights and refugee rights. Ms. Homily testified that she first became aware of the website justice4lgbt.com in or about June 2015 and she read the article “That bed with purple cover and coloured walls”.

[29] Ms. Homily agreed that at first, she did not recognize that this article was about Ms. Amin. However later she realized that the article was about Ms. Amin, and thus Ms. Homily wrote an article herself in Farsi which was published in a Toronto Persian web site magazine. The article included a defence of Ms. Amin.

[30] It was then that she received Facebook messages from Mr. Parsi in the Farsi language. He indicated that he had read the article by Ms. Homily. Ms. Homily responded and in part of her message says “by the way, my article was in defence of Shadi Amin’s dignity and nameless libels and obviously you should stand against defamation of activists”.

⁷ See attached as Schedule G

[31] Mr. Parsi responded in part “Letters regarding rape cases are true; the story regarding threatening people to make them put a like on their posts is valid, as are many stories about refugees”. The Facebook conversation continued and at 1:51 PM Mr. Parsi wrote in part “I stand by the rape letter and I have posted it in my Facebook and I am a contact with the individual and have introduced her to therapists. I published another letter while I was editor-in-chief of Khodnevis and several times after that I declared it publicly.”.

[32] The plaintiff alleges that these quotes set out above are defamatory of Ms. Amin by meaning or implying that Ms. Amin had committed rape and that the accusations made in other blog posts on the website justice4lgbt.com were valid and true.

[33] Almost at the end of her cross-examination Ms. Homily was asked by counsel whether she thought that Mr. Parsi was running justice4lgbt.com. Ms. Homily answered that she didn’t think one way or the other about that but after the messages she said “but it couldn’t be anybody else. And even if there were other people, he must believe in the actions other people are taking”.

[34] The plaintiff called as an expert witness Mark Jeftovic. His qualifications as an expert were not challenged and even his conclusion about the website justice4lgbt.com is not challenged, as the defendant’s expert came to the same conclusion in his report.

[35] Mr. Jeftovic’s conclusion, found in his expert’s report filed at trial, and in his evidence, is that the website justice4lgbt.com was created using as a template a copy of the website irqr.net. It is not contested that this is a website owned and operated by Mr. Parsi.

[36] In the opinion of Mr. Jeftovic, in order to get a copy of the website irqr.net which could be then used as a template, an individual needs administrative level access to the website hosting account and Word Press account associated with the website irqr.net. These accounts are password protected.

[37] Additionally, in Mr. Jeftovic’s opinion, it is very likely that justice4lgbt.com was originally established as a sub account or add-on domain of the website irqr.net and that the individual who established justice4lgbt.com would therefore need access to both the website hosting account and the Word Press account.

[38] Mr. Jeftovic agreed that shortly after it was created, justice4lgbt.com was transferred to a different IP address.

[39] The last witness that I heard from was Ms. Niaz Salimi. There was a challenge to the admissibility of her evidence. I agreed to hear from the witness and decide on whether I should give the evidence that she gave any weight at the conclusion of this matter.

[40] Mr. Wanless argued that I should admit this evidence on the basis that it is similar fact evidence. Ms. Salimi was a member of an organization called the Persian Gay and Lesbian Organization which became the Iranian Queer Organization. Ms. Salimi's involvement in this organization was in 2007 and 2008 and at the same time Mr. Parsi was similarly a member of that organization.

[41] Ms. Salimi testified that on July 16th 2008 a decision was made to dismiss Mr. Parsi from the organization. Part of the reason for this termination was the use of fake identities, hacking, forged texts, making fake email addresses and publicizing and releasing personal email addresses of the directors of the organization. There were other causes set out in a detailed announcement from the organization found at tab 11 of Exhibit 2.

[42] I give no weight to this evidence, given the length of time that has elapsed since the events described by Ms. Salimi and do not consider the evidence to be relevant.

[43] Mr. Wanless introduced as part of the case for the plaintiff, a signed and written statement from Najmeh Zarvzarin Par. Najmeh Par is a refugee from Iran and first met Shadi Amin in June 2014. In June 2015 Najmeh Par received a Facebook message from Mr. Parsi out of the blue asking for a telephone number. Najmeh Par engaged in a telephone conversation with Mr. Parsi about a workshop Najmeh Par had attended put on by 6rang. At the conclusion of the conversation Mr. Parsi told Najmeh Par he would send him a link which he then did. The link was to justice4lgbt.com. Najmeh Par looked at it quickly and stated to Mr. Parsi that "from my point of view Shadi is who she is".

[44] The final piece of evidence for the plaintiff was a signed written statement from Ali Nikouei, who is a resident of the Netherlands. He was asked to investigate the origins of the website justice4lgbt.com, and in his statement he concludes that the domain name was registered on May 21, 2015, that the ping back address was

iqrq.net and that justice4lgbt.com and iqrq.net were hosted on the same server. Based on this information he concluded that whoever established justice4lgbt.com was someone who had control over the webpage iqrq.net.

The defence

[45] Mr. Parsi was the only witness for the defence that I heard from, others were in statement form.

[46] Mr. Parsi left Iran at the age of 24 and eventually came to Canada in 2006. He is an activist in the LGBT community and he is the executive director of a registered Canadian charity called Iranian Railroad for Queer Refugees known as IRQR.

[47] IRQR became a registered charity in August 2016. It has a Board of Directors consisting of six people who are volunteers. The website is known as irqr.net. Mr. Parsi has published a memoir and has received awards for his work in human rights activities.

[48] Mr. Parsi has appeared regularly in the media both in Canada and internationally.

[49] Mr. Parsi testified that he first heard of Ms. Amin at a conference in Montréal and that the first time he met her in person was in Mexico as part of the International Lesbian and Gay Association Conference. When asked of his opinion of Ms. Amin, Mr. Parsi stated that he respected her and that all activists, particularly those from Iran, work together and value each other.

[50] In November 2014 the BBC aired a documentary in which both Ms. Amin and Mr. Parsi were separately interviewed. Mr. Parsi and Ms. Amin engaged in a Facebook chat after the documentary was aired. Mr. Parsi testified that there were a series of complaints about this documentary to the producer who was accused of having a sexual relationship with Mr. Parsi. Mr. Parsi testified that he was told that the people complaining about the documentary were Ms. Amin and Ms. Sadr.

[51] Mr. Parsi explained that he was invited by the owner of Khodnevis to be the guest editor on the International Day Against Homophobia. Khodnevis is an online magazine popular both in Iran and outside Iran in the LGBT community. The owner explained to Mr. Parsi that the responsibility of Mr. Parsi was to write an editorial and ask people to submit information or articles to Khodnevis.

[52] As a result, Mr. Parsi posted on his Facebook and contacted friends and asked people to send him articles. He also wrote an editorial. Mr. Parsi testified that his responsibility was just to read articles that he received from the owner and he himself sent some articles to the owner. Mr. Parsi denied that he was personally responsible for the decision to post particular articles and testified his discussions with the owner were on Facebook.

[53] Mr. Parsi received a text from the owner with a copy of what has been known during the trial as the “refugee letter”. It was the owner who made the decision to publish. As far as Mr. Parsi was concerned, the refugee letter was not about one particular group but more than one.

[54] Mr. Parsi testified about an article that Ms. Amin posted on her Facebook page titled: “Avoiding fights with the pig”.⁸ Mr. Parsi agreed that there is no reference to him, but he believed that the article was about him. He found the article insulting and disrespectful.

[55] As a result, Mr. Parsi then posted an article entitled “The tale of stick and the thieving cat”.⁹ Mr. Parsi later deleted the post on his web site.

[56] Mr. Parsi testified that he read the article written by Ms. Homily on July 23, 2015. He knew Ms. Homily from working on refugee issues. He wanted to know whether Ms. Homily had done due diligence before writing her article. He felt that Ms. Homily was angry at him. This is why he engaged in a Facebook chat with her.

[57] Mr. Parsi next testified about the article entitled “The room with purple cover and coloured walls”. He agreed that it was about rape, but that it was mostly emotional rape not rape as a sexual relationship without consent.

[58] With respect to the email to Amnesty International, he testified that the first time he saw this document was when it was attached to the original claim.

[59] Mr. Parsi agreed that he had posted the article entitled “The room with purple cover and coloured walls” on his Facebook page and asked people to comment about it. He denied that he meant that the article was true.

⁸ See attached as Schedule H

⁹ See attached as Schedule I

[60] He testified about his efforts to obtain a “Norwich” order that would compel companies such as Facebook, Google and HostGator to release information to see who trespassed into his server. He testified that he had contacted HostGator on several occasions to obtain assistance and that on several occasions he and his representatives attempted to set up a conference call and contact representatives of HostGator to negotiate what was required to obtain the necessary evidence, to no avail.

[61] Mr. Parsi alleged that as a result of reading the plaintiff’s expert’s report he realized that someone may have installed a folder justice4lgbt without his permission and installed Word Press software in that folder. He testified that until the expert made this discovery, he was unaware and had no reason to believe there was any actual connection between himself, his organization and justice4lgbt.

[62] Mr. Parsi confirmed that a Norwich order was granted but the Order only applied in Ontario whereas HostGator is a US corporation. Mr. Parsi testified about his efforts to call HostGator to see if he could obtain information about who had created justice4lgbt, but he was unsuccessful.

[63] Mr. Parsi testified that when his expert witness looked into justice4lgbt, it was confirmed that the website was removed as a sub domain of irqr.net in 2015 but for period of two years he did not actually know that.

[64] Mr. Parsi did admit that in a Facebook conversation with Samira (Najmeh Par) he did send the link to justice4lgbt.com. Mr. Parsi testified that this was someone who he had spoken to before. Further, he testified that he was not trying to convince Najmeh Par to believe the contents of that website but rather the opposite.

[65] Mr. Parsi testified that in 2017 he contacted justice4lgbt directly because he wanted to defend himself. He then received a series of emails. Mr. Wanless objected to the introduction of these emails, but Mr. Amouzgar accepted that he was not offering them for the truth of the contents, merely that they were sent and received by Mr. Parsi.

[66] One email is from justice4lgbt@Gmail.com addressed to Mr. Parsi. It says in part “sorry to see how these bad people want to track work which is not related to you at all”. The email is a reference to the statement of claim Ms. Amin had issued.

[67] Another email was sent by Mr. Parsi in July 2017 asking justice4lgbt to identify themselves publicly. An email in response refused to provide that information and is allegedly from Dr. Emad Tabandeh.

[68] Mr. Parsi once again wrote requesting the assistance of Dr. Tabandeh and he replied without providing any identification information.

[69] Further email correspondence ensued. In one of those emails Dr. Tabandeh alleges that a volunteer was responsible for using the irqr host for setting up justice4lgbt.

[70] Mr. Parsi also introduced emails alleged to have come from other individuals being responsible for some of the articles in issue in this action and some from other individuals alleging cyber activities of security agencies in Iran.

[71] Mr. Parsi introduced what he alleged is an official affidavit of Shervin Shafirad that was supposedly sent to him by Dr. Tabandeh. Again, Mr. Wanless objected to the introduction of the statement, but again Mr. Amouzgar confirmed that he is not claiming that I should rely on the truth of the contents of this statement. It alleges that the person making the statement was responsible for establishing justice4lgbt. Similarly, a statement was introduced from Sanaz Zandi alleging that he or she was responsible for justice4lgbt.

[72] In cross-examination Mr. Parsi admitted that as executive director of IRQR he was in charge of everything that was happening in the organization including the website. He agreed that he was the one who set up and paid for the HostGator account for irqr.net.

[73] Mr. Wanless asked Mr. Parsi whether he agrees that the website justice4lgbt attacks Ms. Amin. Mr. Parsi was evasive in answering this question but finally testified that his interpretation of that website was that there were serious questions raised to Ms. Amin.

[74] Mr. Parsi agreed that when the website was first established it was established on his HostGator account. Mr. Parsi denied having anything to do with justice4lgbt. Mr. Parsi stated that he believed someone hacked into his web hosting account.

[75] Mr. Wanless pressed Mr. Parsi on his views on Ms. Amin and agreed that in 2015 he respected her until she wrote the post about a pig when he became angry. Mr. Parsi would not agree that he was not referred to in that article.

[76] Mr. Parsi agreed that the Iranian diaspora is worldwide and that the LGBT community is often online and that someone's online reputation is particularly important.

[77] Mr. Parsi would not agree that being called homophobic was necessarily harmful to a person's reputation. He did agree that being accused of money laundering would be damaging. He agreed that trust is very important when dealing with LGBT groups in Turkey and that refugees in Turkey are a vulnerable group.

[78] Mr. Parsi first heard about the website justice4lgbt in June 2015 and that the first article he read was the bed with the purple cover article. He shared it on his Facebook. He does not believe that it is about anyone in particular. He does not believe the article is damaging to anyone.

[79] Mr. Parsi would not agree that when he read the articles on the website that they were about any person in particular. He agreed that he was not defending any of the articles.

[80] When pressed, Mr. Parsi would not agree that the article entitled "you are a homophobe and anti-male" was alleging that Ms. Amin was homophobic. Instead he suggested that it was about tension within the LGBT community.

[81] Mr. Parsi insisted that the articles do not state facts but that they raise questions. He did not think it was an issue that the website is anonymous and it did not bother him.

[82] Although in his opening statement Counsel for Mr. Parsi stated that they might be using the defence of justification, Mr. Parsi in cross-examination, after being pressed by Mr. Wanless, agreed that he did not want to do that.

[83] Mr. Wanless took Mr. Parsi to each of the articles in question but at no time did Mr. Parsi suggest that he believed the allegations against Ms. Amin were true, if they were about Ms. Amin. Mr. Parsi was particularly evasive when pressed by Mr. Wanless over the interpretation of the various articles.

[84] When asked whether the website was possibly the work of the Iranian government, Mr. Parsi testified that he had no idea but it could be a possibility. Mr. Parsi denied that in June and July 2015 he went out of his way to promote justice4lgbt.com nor did he defend it.

[85] Mr. Parsi admitted that twice he shared links to the website. He also shared the two articles on his Facebook, the article about the bed with purple cover and the article about Ms. Amin being homophobic.

[86] Mr. Parsi denied contacting Samira specifically about the website. He admitted to sending her the link after a conversation but denied that he was investigating Ms. Amin. He admitted that Ms. Amin was mentioned in the conversation.

[87] Mr. Parsi admitted that he contacted Ms. Homily because she had written an article defending Ms. Amin. He contacted her on the same day that he read her article. He stated he did this to see if Ms. Homily had done due diligence. Mr. Parsi denied that his response was about rape. He believes that the purple bed article was about conflict of interest.

[88] Mr. Parsi admitted sending a letter to the Board of Directors of IRQR. In it he states that he was aware that the website had published a lot of information about Ms. Amin. Later he says that he was approached by some individuals who introduced themselves as victims, but in further cross-examination denied that that was a reference to be victims of Ms. Amin.

[89] Mr. Parsi admitted that he had the bed with the purple cover letter in his email account prior to it being posted on justice4lgbt. He received it on May 18, 2015. He testified that he received it from a colleague of his in Sweden who is an Iranian LGBT activist. Justice4lgbt was created on May 21 and on May 23 he responded to the letter about the purple cover and that he would like more letters sent to him. On June 8, 2015 the same purple cover letter was posted on justice4lgbt and on June 14 Mr. Parsi posted a Facebook link to that letter.

[90] Mr. Parsi agreed that one of the articles published on justice4lgbt was the same article that was published in Khodnevis. This is known as the refugee letter. He denied having any control over what was published in Khodnevis. As far as he was concerned his honorary position was symbolic. He denied that the letter is about Ms. Amin.

[91] Mr. Parsi did not do any verification of the refugee letter. He denied that it's about any organization in particular.

[92] The pig post that Ms. Amin wrote Mr. Parsi insisted was about him and so he responded about her. He admitted being upset after the post by Ms. Amin. He denied that the post by him had to do with the guilty mind.

[93] Mr. Parsi did not check his own HostGator account for any activity in May 2015. He agreed attempts had been made to arrange a conference call with all parties with HostGator to determine whether justice4lgbt was added as a sub- domain of his account in May 2015, but after reviewing the several exchanges of correspondence with counsel, Mr. Parsi confirmed he did not agree to a conference call.

[94] Mr. Parsi's opinion is that someone hacked his account but he did not report this to HostGator. He has no evidence from HostGator that his account was hacked.

[95] Mr. Parsi agreed that the plaintiff had requested the names of other people who had access to the web hosting account irqr.net. The requests were ignored until at the settlement conference Deputy Judge Ntoukas (as she then was) ordered that the defendant was to serve and file all relevant information regarding individuals involved in the creation and ongoing administration, including access to WordPress and web hosting accounts of irqr.net and arshamparsi.net and justice4lgbt.com.

[96] This order was not complied with and I ordered compliance to be done on or before 13 October 2017 as a term of an adjournment of the trial.

[97] Mr. Parsi did file an affidavit with some information, but not the names of individuals involved or contact information. He stated that the information was not relevant.

[98] Mr. Parsi agreed that in his evidence in chief he said that the board of directors had access but did not provide that information until he was giving evidence. He assumed that the plaintiff knew that.

[99] Mr. Parsi received an email from somebody claiming that he or she had hacked in the website. He also received documents from the anonymous source immediately before the original trial date.

[100] Mr. Parsi agreed that he did not go back to his web hosting account to see if there was any evidence to substantiate what this anonymous person admitted to on his HostGator account.

[101] There were no attempts to have the individuals concerned testify in court. Mr. Parsi denied that he is the person writing these emails or that he knows the persons involved.

[102] The re-examination of Mr. Parsi referenced a conversation with someone who called him after the Khodnevis article. She complained about Ms. Amin. He also testified that he heard from others and so wrote and posted an article entitled Stop the Intimidation. Mr. Parsi denied that he was upset with Ms. Amin at this time but felt that it was unprofessional for Ms. Amin to interrogate LGBT refugees as alleged by complainants.

[103] It was shortly after that that Ms. Amin posted on her Facebook and called Mr. Parsi a pig and insulted his family. Mr. Parsi admitted that his response was still on his Facebook page but he had deleted it the day before giving this evidence.

[104] Mr. Parsi agreed that his article was about Ms. Amin because she called him a pig.

[105] Mr. Parsi confirmed that the editor of Khodnevis was the one who had the authority on publishing and approving the material that was published on that website.

[106] Mr. Parsi also referenced some articles on justice4lgbt.com that he says do not refer to Ms. Amin.

[107] For the defence, the expert report of Navid Mohaghegh was filed as an exhibit. In his report he confirmed justice4lgbt.com was a sub-domain of irqr.net being created on May 21, 2015 and hosted there for some time in May but was gone in early June 2015.

[108] Also introduced for the defence was a witness statement of Ali Hamedani. He was involved in the production of a BBC documentary featuring both Ms. Amin and Mr. Parsi. The documentary explored the issue of gender reassignment in Iran. The

witness alleges that after the documentary aired Ms. Amin engaged in a vindictive campaign to defame Mr. Parsi. Ms. Amin made complaints to the BBC and the BBC launched an investigation. The BBC concluded that the complaints were without bases and facts.

The law and my conclusions

[109] It is trite law that in a libel action the plaintiff must prove on a balance of probabilities:

- (a) The words about which the plaintiff complains are defamatory;
- (b) The words refer to the plaintiff;
- (c) The words were published to someone other than the plaintiff, and particularly in this case, by the defendant.

[110] Assuming these elements are established, falsity and damage are presumed and the onus shifts to the defendant to establish on a balance of probabilities, in this case, fair comment and responsible communication on a matter of public interest.¹⁰

[111] To determine whether the words complained of bear a defamatory meaning, the question is whether the words in their ordinary signification are capable of being defamatory. The words do not have to be understood in a defamatory sense by everybody who reads or hears them. The question is whether a reasonable person to whom the words were published would understand them in a defamatory sense.

[112] In determining the meaning of the impugned statements, all of the circumstances of the case may be considered, including; (a) any reasonable implications the words may bear; (b) the context in which the words were used; (c) the audience to whom the words were published; (d) the manner in which the words were presented.¹¹

[113] A defamatory meaning is one that injuriously affects a person's fame, reputation or good name, or diminishes her respectability.

¹⁰ Grant v. Torstar 2009 SCC 61

¹¹ The Law of Defamation in Canada, R.E. Brown Chapter 6

[114] Applying this test, I have no hesitation in finding that the article titled “BBC researcher has criminal background but no secondary School diploma” is defamatory and it is clearly about Ms. Amin. It references her by name and alleges that she was involved in recent scandals and major money -related lawsuits, money laundry [sic] and documented cases of verbal, physical and sexual harassment.

[115] Applying this test, I have no hesitation in finding that the article titled “You are a homophobe and anti male, Ms. Amin” is defamatory and is clearly about Ms. Amin. It references her by name and alleges that Ms. Amin hates men and bisexual people, that she is homophobic and aggressively promotes these views and has misrepresented her sexual orientation in order to gain fame, wealth and sexual relationships.

[116] Applying this test, I have no hesitation in finding that one sentence in the article titled “Report: do you even censor Wikipedia?” is defamatory and is about Ms. Amin. The sentence is referred to in paragraph 14 above. It mentions Ms. Amin and alleges that she is involved in hiding financial improprieties and other wrongdoings.

[117] Applying this test, I have no hesitation in finding that the email sent to Amnesty International is defamatory and is about Ms. Amin. It mentions her by her full name and alleges that she has engaged in widespread wrongdoing and abuses including rape, bullying and money laundering.

[118] Apart from the Facebook messages to Ms. Homily, this leaves for determination the articles known as the refugee letter and the bed with the purple cover. Neither of these articles refer to Ms. Amin directly. Thus, I have to apply the legal test with respect to whether the words are such as would reasonably lead persons acquainted with the plaintiff to believe that she was the person referred to.

[119] The test is discussed in detail in *S. G. v. J. C.*¹² a decision of the Ontario Court of Appeal. The court refers to Professor Brown’s text on Defamation as follows;

“It is not necessary that the plaintiff be identified by his or her proper name, or even mentioned at all, if it is otherwise shown that the words would be reasonably understood to refer to the plaintiff. He or she may be referred to in the guise of some fictional or historical character or by a play on words. It may be clear from other evidence that he or she was the one alluded to, but he or she must satisfy the court in that regard. This may be done by introducing evidence, apart from the publication, connecting the plaintiff with the defamatory publication. The question in such a case is whether or not the words used are such as to lead an ordinary sensible person, or reasonable persons, who pay reasonable attention to the contents of the communication, to understand that it was the plaintiff to whom the defendant referred.

¹² 2001 CanLII 3041

The test of whether words that do not specifically name the plaintiff refer to him or her or not is this: are they such as reasonably in the circumstances would lead persons acquainted with the plaintiff to believe that he or she was the person referred to? That does not assume that those persons who read the words know all the circumstances or all the relevant facts. But although the plaintiff is not named in words, he or she may nevertheless be described so as to be recognized; and whether that description takes the form of a word picture of an individual or the form of a reference to a class of persons of which he or she is believed to be a member, or any other form, if in the circumstances the description is such that a person hearing or reading of the alleged libel would reasonably believe that the plaintiff was referred to, that is a sufficient reference to him or her.”

[120] Applying the test to the refugee letter I am not persuaded that Ms. Amin is referred to in this article. The article is a long complaint about how the refugee was treated during her time in Turkey. However, on a fair reading of the article it is about organizations and not one particular person that the author is complaining about. It is true that Ms. Amin is a member of the organization 6Rang, and that this organization is active in Turkey assisting refugees from Iran. The article does reference “one such organization, whose directors were omni-present in Persian speaking networks outside Iran as a lawyer and a human rights activist”. The plaintiff submits that” human rights activist” is a reference to Ms. Amin, but again the author is complaining about the organization not the individuals concerned.

[121] Having reached this conclusion, I do not necessarily need to decide whether the article is defamatory. If I am wrong about my conclusion however, for the sake of completeness, I am also not persuaded that the article is defamatory of a particular individual. The author is highly critical of the manner in which she and other refugees are treated in Turkey. For example, the author writes “this bitter experience I had in the very early months of my stay in Turkey made me decide not to contact any groups.”.

[122] Applying the test to the article “The bed with the purple cover...” I find that this article is about Ms. Amin, even though she is not mentioned by name.

[123] The article is in Farsi and is meant for the Iranian LGBT community. The article is about a female human rights activist for LGBT and Ms. Amin is such an activist. The posting is about a woman who is a comedian and Ms. Amin testified that one of her hobbies is stand up comedy. The posting is about a woman who recently appeared on BBC television. Ms. Amin regularly appears on BBC Persian television as a commentator. The posting makes reference to the woman’s closed Facebook group. Ms. Amin has such a group. The posting makes reference to a woman offering counselling and consultation services, which Ms. Amin provides to the LGBT community.

[124] I heard evidence from Ms. Homily that, although at first, she did not recognize the article as being about Ms. Amin, she did come to that conclusion eventually and thus published the article defending Ms. Amin.

[125] Applying the test of whether the words are capable of being defamatory, I conclude that they are indeed defamatory. The author alleges that she was raped by Ms. Amin and that Ms. Amin committed emotional rape. The article also says that Ms. Amin has exploited intimate and sexual relationships with clients and that she hates gays and bisexual people. Finally, the article alleges that Ms. Amin has a hidden camera in her bedroom used to record visitors without their knowledge or consent.

[126] I turn to the Facebook messages between Ms. Homily and Mr. Parsi. The context of these messages is important. Ms. Homily had published an article defending Ms. Amin which Mr. Parsi had just read. In the first message Mr. Parsi refers to Ms. Amin. Ms. Homily responds that she wrote her article in defence of Shadi Amin's dignity and nameless libels. Mr. Parsi replies in part "Letters regarding rape cases are true..." thereby implying that Ms. Amin was the rapist. Later he states "I stand by the rape letter and I have posted it in my Facebook", implying the same thing.

[127] Thus I find the words refer to Ms. Amin and are defamatory of her, but of course, were only published to Ms. Homily.

[128] Before turning to the issue of whether Mr. Parsi is responsible for publication, I turn to the defences raised in the amended amended amended defence and to the written closing submissions of the defendant. I will specifically reference the submissions as they appeared to me to go way beyond what is set out in the defence. Nowhere in the pleading is there a claim that the articles on justice4lgbt.com or the email to Amnesty International were not defamatory or malicious, or were covered by the defence of fair comment.

[129] The defence repeatedly denies that Mr. Parsi had any involvement in the impugned web site or was the author of the articles or email. However, the written submissions contain 50 pages essentially defending the articles and the email. I have reviewed these submissions but give them no credence as the defences were not pleaded and submit, for example, that to accuse Ms. Amin of being involved in rape or financial scandals does not lower Ms. Amin's reputation. That is simply preposterous. The submissions also purport to claim the allegations are based on facts, which facts were not proven at trial.

[130] The only reference to fair comment and responsible communication as defences in the defence is with respect to the actions of Mr. Parsi. With respect to the alleged defamatory publications, these were the messages with Ms. Homily and the reposting of the article the bed with the purple cover on his Facebook page.

[131] The test for the defence of fair comment is set out in *WIC Radio Ltd v. Simpson*¹³ as follows:

- a. The comment must be on a matter of public interest;
- b. The comment must be based on fact;
- c. The comment, though it can include inferences of fact, must be recognizable as comment;
- d. The comment must satisfy the following objective test: could any person honestly express that opinion on the approved facts;
- e. Even though the comment satisfies the objective tests, the defence can be defeated if the plaintiff proves that the defendant was subjectively actuated by express malice.

[132] The test for the defence of responsible communication on a matter of public interest is set out in *Grant v. Torstar*¹⁴ as follows:

- a. The publication is on a matter of public interest, and
- b. The publisher was diligent in trying to verify the allegation, having regard to:
 - (1) the seriousness of the allegation;
 - (2) the public importance of the matter;
 - (3) the urgency of the matter;
 - (4) the status and reliability of the source;
 - (5) whether the plaintiff's side of the story was sought and accurately reported;
 - (6) whether the inclusion of this defamatory statement was justifiable;
 - (7) whether the defamatory statement's public interest lay in the fact that it was made rather than its truth;and
- (8) any other relevant circumstances.

[133] It is trite law that the defence of fair comment applies to comment only and not to statements of fact. If the defendant fails to prove the truth of the underlying facts at trial, the defence of fair comment will fail. See *Awan v. Levant*¹⁵.

[134] In his message to Ms. Homily Mr. Parsi states that "letters regarding rape cases are true.". This is a statement of fact not a comment. Similarly, in the bed with the purple cover the author writes "she hated gay people and loathed bisexual people". Then the author writes "she is raping me emotionally every single day. I think to myself that she only cares about her bank account, and the long list of names with whom she has shared a bed. She hates men, but her behaviour and clichés are revolting, chauvinistic and lumpen attitudes." These too are statements of fact and

¹³ 2008 SCC 40

¹⁴ 2009 SCC 61

¹⁵ 2014 ONSC 6890 upheld 2016 ONCA 970

not comment and thus the defence does not apply. No evidence was led to prove the truth of facts such as these.

[135] The defence of responsible communication fails as neither of the publications are on a matter of public interest and there was no urgency attached to the communications.

[136] The remaining issue is whether the plaintiff has satisfied her burden of proving Mr. Parsi was responsible for publication.

[137] The plaintiff submits that the following facts support her position that Mr. Parsi is responsible in whole or in part for publication of the articles on justice4lgbt.com and the email.

1. When justice4lgbt.com was first established it was hosted on Mr. Parsi's private web hosting account that he had purchased and managed.
2. Mr. Parsi is the executive director and sole employee of IRQR and as such was responsible for managing and updating irqr.net.
3. The expert evidence is that justice4lgbt.com was originally hosted on Mr. Parsi's web hosting account before it is transferred to another anonymous account. It was set up as a sub domain of irqr.net. Mr. Jeftovic testified that it was very likely that the website was created using irqr.net as a template and then modified and that whoever created the website had access to the web hosting account and WordPress account of irqr.net.
4. On the same day that justice4lgbt was created, Mr. Parsi posted his own web post attacking Ms. Amin in the article entitled "the tale of stick and thieving cat".
5. Mr. Parsi had in his email account a copy of the article posted on justice4lgbt.com entitled "That bed with purple cover and coloured walls" prior to it being posted on justice4lgbt.com
6. The first article that was posted on justice4lgbt was the same one that was published on the Khodnevis website when Mr. Parsi was the guest editor.
7. Mr. Parsi shared articles on his Facebook from the website together with the comment implying that the website was reputable. He then shared a link to an article on justice4lgbt.com entitled "New mail in: you are a homophobe and anti male, Ms. Amin".
8. When he read an article by Ms. Homily defending Ms. Amin he immediately defended the allegations about Ms. Amin in Facebook messages with Ms. Homily. Not only did he defend the allegations about Ms. Amin, he claimed that they were true.
9. Mr. Parsi contacted Ms. Par after not having been in contact with her for a while in order for her to look at the website and to discuss Ms. Amin.

10. Mr. Parsi says that when he was served with the plaintiff's claim he did not take it seriously, even after he was informed that the website was hosted as a sub domain of irqr.net.

11. He did not conduct more than a cursory investigation into the allegation that the website was originally hosted on his web hosting account. He did not get whatever information was available to him from HostGator to see whether or not there was any truth to the plaintiff's accusations.

12. Mr. Parsi did not contact HostGator to request logs of activity on his account in May 2015 nor did he download available information from his HostGator account regarding activity on his account in May 2015.

13. Mr. Parsi actively attempted to prevent the plaintiff getting proof that the website was originally hosted on Mr. Parsi's web hosting account. A simple plan that can provide a definitive answer to the question by use of a conference call was suggested, and although at first Mr. Parsi agreed to this proposal he then imposed conditions, cancelled agreed upon dates, and eventually reneged on his original agreement.

14. Once it became clear that there was expert evidence connecting the website to Mr. Parsi's web hosting account he alleged that his account must have been hacked by unknown individuals. Mr. Parsi made no attempt to gather evidence from Host Gator that he could use to prove to the court that the alleged hack had occurred.

15. Mr. Parsi made no attempts to get logs from HostGator that might reveal who had access to or attempted to access his web hosting account in May 2015.

16. Mr. Parsi refused to answer the question of who besides him had access to his web hosting account. Counsel for the plaintiff repeatedly asked Mr. Parsi to provide this information, and Mr. Parsi failed to provide the information even though ordered by the court on two occasions to do so.

17. Finally Mr. Parsi did disclose that there were three other individuals who had access to the web hosting account but he did not provide the names of these individuals.

18. For the first time during the trial, Mr. Parsi acknowledged that unnamed members of the Board of IRQR also had access to his web hosting account.

19. In spite of receiving emails from parties alleged to be responsible for justice4lgbt.com no evidence admissible in court was provided from them.

[138] Mr. Parsi submits that Ms. Amin has not met the onus. He submits that all of the impugned articles were published on the website sometime after it was removed from Mr. Parsi's server. Mr. Parsi submits that it would be inconsistent with attempts at hiding his identity while then contacting friends of Ms. Amin and others who would report back to Ms. Amin.

[139] Mr. Parsi points out his efforts to obtain a Norwich order which was used to try and determine the identity of the individuals responsible for the website, but Ms. Amin refused to cooperate in that effort.

[140] Mr. Parsi, upon receiving the plaintiff's expert's report, retained his own expert who confirmed the plaintiff's expert's findings.

[141] On May 21, 2015, the day the website was registered, Mr. Parsi was calling for unity and seeking to engage with Ms. Amin to build bridges and he sent her a message congratulating her on the publication of her book.

[142] Mr. Parsi submits he only responded with the article entitled "the tale of stick and the thieving cat" as a response to a personal attack by Ms. Amin on Mr. Parsi in her article. Shortly after posting his article it was removed by him but he forgot that it was still on his Facebook page and he removed that when it was pointed out to him.

[143] Mr. Parsi submits that he took all reasonable steps to identify the parties responsible for the website. The plaintiff's expert's report was not delivered until July 2017 and until he read that report he had no reason to believe there was any connection between himself, his organization and the parties responsible for setting up the website.

[144] Mr. Parsi does not wish to provide the names of the volunteers who work with his organization as he has promised confidentiality as to their identities, particularly as they are vulnerable persons many of whom continue to live or have family who live in Iran.

[145] Mr. Parsi has shared his efforts to contact HostGator during his investigation, including the recording of one of his phone calls.

[146] Mr. Parsi has received several emails from people assuming responsibility for the creation of the website.

[147] The fact that Mr. Parsi had access to copies of the articles before they were published on the website, results from his being a guest editor of Khodnevis and the people were sending him articles for possible publication.

[148] On a balance of probabilities, I am persuaded that Mr. Parsi was involved in the creation and publication of the articles on justice4lgbt.com and for the email. I

come to this conclusion for the cumulative reasons submitted by the plaintiff set out above. Most persuasive is the following. It would have been the simplest of tasks to obtain from HostGator information to show who created the sub-domain of the website owned and paid for by Mr. Parsi. Instead, Mr. Parsi created obstacles in the way of obtaining this information. Similarly, when faced with the evidence that the impugned website was a sub-domain of Mr. Parsi's website, Mr. Parsi alleged that the account must have been hacked, but again took no steps to request from HostGator evidence or information confirming this allegation.

[149] Rather Mr. Parsi brought an application for a Norwich order which he knew or ought to have known would have no effect outside of Ontario. Then he provided information from anonymous sources in an effort to exonerate himself but provided this information in a manner that was impossible to independently verify.

[150] The second basis for finding Mr. Parsi responsible, is the disingenuous way he testified about the articles that defame Ms. Amin. I use one example only. For the article entitled "you are a homophobe and anti male Ms. Amin", Mr. Parsi testified that the article was really about tension between various groups within the LGBT community and not about attacking Ms. Amin. This, in spite of the very headline that does just that.

[151] This position was then compounded by attempting to defend the various defamatory articles in the closing submissions of the defendant.

[152] Thus I find Mr. Parsi liable for the defamatory articles published on justice4lgbt.com and for the email sent to Amnesty International. I do not find him liable for the refugee letter published on Khodnevis, as I have not found that article refers to Ms. Amin. He is also liable for the email messages to Ms. Homily, but the publication was only to her.

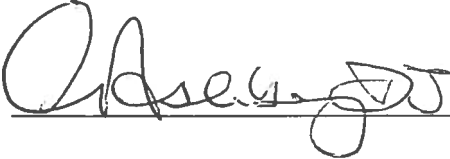
[153] The final issue is to determine damages. Damages in a libel action are at large. The principles guiding the court in the assessment of damages are set out in *Minar Mar Group v. Divine*¹⁶. The factors to consider are [a] the plaintiff's position and standing; [b] the nature and seriousness of the defamatory statements; [c] the mode and extent of the publication; [d] the absence or refusal to retract the libel or to apologize; [e] the conduct and motive of the defendant; [f] the presence of aggravating or mitigating circumstances.

¹⁶ 2011 ONSC 1172

[154] As the Court of Appeal recently held in *Rutman v. Rabinowitz*¹⁷, the pernicious effect of defamation on the internet, or cyber libel, distinguishes it, for the purposes of damages, from defamation in another medium. An analysis of the damages occasioned by the extensive Internet defamation campaign must be evaluated in the context of the unique and somewhat insidious nature of Internet defamation and in light of the fact that the defamatory statements were instantly available to an unknown number of recipients.

[155] In my opinion, the general damages for libel amount to the maximum claimed of \$25,000, thus I need not deal with the claims for other damages. The plaintiff, although a resident of Germany, is well known throughout the international LGBT community. The defamatory statements accuse her of rape, money laundering and other serious charges. The defamatory statements were broadcast on the Internet and there has been a complete absence of any retraction or apology. The defendant appears to have been motivated by his anger at the plaintiff. For these reasons I believe the maximum amount is appropriate.

[156] Thus, there will be judgment for the plaintiff against the defendant for \$25,000 plus pre-and post judgment interest pursuant to the Courts of Justice Act from September 29th 2015. The parties may make submissions as to costs through the court office and this may now be done electronically to Torontosmallclaimscourt@Ontario.ca. The subject line of the email must indicate my name, the file number and style of cause and must, of course, be served on the other party. The plaintiff's submissions are to be filed by no later than April 30 and the defendant submissions by May 18.



A handwritten signature in black ink, appearing to read 'A. G. J.', is written over a horizontal line.

APR 17 2018

¹⁷ 2018 ONCA 80



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CERTIFIED TRANSLATION

(Persian/ Farsi into English)

Letter: BBC Researcher has Criminal Background but No Secondary School Diploma

July 10, 2015



It was months since Soheila Amintorabi (Shadi Amin) had been absent from mainstream Farsi media when we found her reappearing on Farsi BBC Television as a researcher and a human rights activist.

But how is it that Lady Soheila has found her way into BBC once again? Especially after the recent scandals and major money related lawsuits, money laundry, and documented cases of verbal, physical and sexual harassments, how is it that the BBC directors have not bothered to question themselves whether they can call someone a researcher simply because she wishes to be called so when they label such a notorious person as a researcher (in the case of Shadi Amin, she has not even completed grade 8 and dropped out of school at the age of 14, as she has written herself). Can she be called a human rights activist simply because she is opposed to the Islamic Republic of Iran regime? Can she be decorated with a string of titles and labels thanks to some weblog posts, self-made awards, and the organizations that are mostly one-person operations and baseless according to Deeds Registration Company of Britain? What is the story?

For some time, there has been some news of Soheila Amintorabi's (Shadi Amin) efforts to establish networks of friends and bribe certain Farsi media officials to buy time and impose herself on them. They talk about her leaving home in California and moving to Farnkfurt and living with Shadi Sadr, who has

many friends among BBC officials and reformist journalists who have move to London from Iran. However, the real truth emerges when we hear about the experiences of different people.

There are numerous cases where Shadi Amin, to achieve her goals, has resorted to forcing people to give interviews for imaginary projects, especially among the LGBT asylum seekers in Turkey, starting short-term personal relationships, and receiving financial help from governments and mostly private persons (raising cash from wealthy individuals for helping refugees), and she has introduced herself as not only a researcher and human rights activist but also as a film maker, a journalist, and an advisor for BBC and Voice of America. In some cases, she has presented herself as the behind-the-scene director and the manager for several media projects in BBC and Manoto TV. For instance, in the case of the successful project of "Gender or Sexism" on Farsi BBC, Shadi Amin introduced herself as the behind-the-scene director of this project in her two speeches in Frankfurt and Hannover. She added that to trick her BBC friends into accepting this project, she had organized a party where she attempted to persuade some BBC officials to proceed with this project and that the idea and the method of execution were hers; otherwise, in her words, "No one could have thought of such works in these media." Another example is the documentaries known as "Roo-dar-Roo" (One on One) on Manoto TV. She said she had written the script and presented it to the director and that the host and all the crew were managed by her; she had even determined the angles of the cameras and paid the program host out of her own pocket. The proof is Shadi Sadr's presence in the first episode of this documentary and her own (Shadi Amin) presence in the second episode.



Shadi Amin on her 50th Birthday in 2014

According to her, this party was held in the house of one of the BBC directors.

In a gathering in Toronto, she claimed that it was her who introduced Sadegh Saba, the current director of Farsi BBC, to Fadaian Organization (Minority), further claiming that "Although everybody ignores Sadegh these days and he has become a reformist, it was Comrade Soheila that composed his refugee reference letter." This claim is completely false.

Once you become familiar with the operations of these media, the absurdity of Shadi Amin's sense grandiosity becomes apparent. However, it should be kept in mind that Shadi Amin needs to appear in certain media at least once or twice so that she has proof of her grandiosity and her claims in the different circles. To this end, she has always tried to securely hold on to the feminist inner circles of the

media such as BBC in the event she gets into a fight with someone, even becoming generous (not that she directly paid the directors to attend the programs, but in at least two projects of Justice for Iran Organization, one BBC editor and one BBC producer worked with Shadi Amin and Shadi Sadr on a contract basis. It is then all natural that once the project is released, that producer and that editor would force these ladies on BBC as proof of their friendship and use BBC as the springboard for the introduction of a project in which they were partners. This is against BBC regulations).

The point that is missed by BBC and similar media is the height of abuse by Shadi Amin from the credit she receives by participating in these interviews. She interviews people under the name of BBC in Turkey or achieves her goal (forced participation in a meeting or a personal relationship) among very vulnerable asylum seekers in Turkey with, "Haven't you seen us on BBC? We're famous and well-known people." In one case, the asylum seeker committed suicide (but was fortunately rescued). It is well known that Shadi Amin had started a relationship with the above individual under the pretext of making a documentary for BBC and had told him that if that documentary was not completed, the said asylum seeker would never set foot in Canada.

It goes without saying that the reappearance of Shadi Amin in BBC after months of absence, which it is said was due to the disclosure of her corruption and that of the groups under her management, will have consequences with direct liability for BBC management. The BBC management has turned a blind eye on the nepotism on the part of certain feminists within this media (who constantly breach their neutrality and prefer giving a voice to their like-minded friends to honest and ethical journalism), and due to the scarcity of qualified men and women, it has failed to find somebody else to be the speaker for the opinions representing certain opposition fronts of the regime, thus clinging to such a notorious person as Soheila Amintorabi (Shadi Amin).

We must not remain silent and we must object to the deceptive presence of Soheila Amintorabi (Shadi Amin) by writing letters to BBC.

Send this letter to "Safheye Do" program (Page Two), which Shadi Amin has attended:
safheye2@bbc.co.uk

The identity of the writer is secure with Justice for LGBT

Source: <http://justice4lgbt.com/?p=509>

Certified Translation of Article in Farsi in 2 Pages.

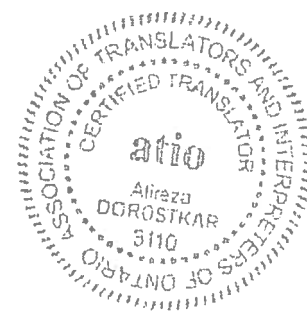
TRUE TRANSLATION OF ATTACHED FARSI DOCUMENT IS CERTIFIED.

Toronto, Ontario, Canada, Sept. 15, 2016

Alireza Dorostkar

**Certified Translator (Association of Translators and Interpreters of Ontario,
ATIO)**

Certification No. 3110





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CERTIFIED TRANSLATION

(Persian/ Farsi into English)

Report: Do You Even Censor Wikipedia?

June 10, 2015

Shadi Amin (whose real name is Soheila Amintorabi, the ex-wife of Hassan Behzad, a member of Fadayian Organization, Monority) was born to a big family in the city of Karaj in January 1965. At the age of 14 and after the 1978 revolution, she commenced her political activities as a supporter of Organization of Peoples Fedai Guerrillas and after the divisions within this organization.....

The censored profile of Soheila Amintorabi (Shadi Amin) on Wikepedia

Hello Ms. Shadi Amin

According to its definition, Wikipedia is an online encyclopedia with 280 languages with free content written with the help of volunteers, and anyone with Internet access can edit its articles.

Do you know the reason behind the formation of Wikipedia? It was to prevent the distortion of facts and the abuse of information by relying on the principle of clarity and the all inclusive participation of all the users. Alas, you are not interested in any form of freedom, and apparently you subscribe to the method of distortion and inducement of facts.

After I received an email, I tried to update your name and information according to the reliable and registered documents of your companies in England and Iran Dat Co. in Germany in your Wikipedia profile. I had no ill intentions, but I think in today's free world, people have the right to know your real name, which is no secret and can be found with one or two searches on English and German Google. As you yourself insist, you are no ordinary person but a so called human rights activist, writer, feminist and all sorts of labels you have decorated yourself with.

Lo and behold, a fight ensued; every hour, your name would change on Wikipedia and you would censor it with your own Wikipedia account. Don't you want anyone to know your name? Why do you hide your date of birth? Can someone be a public figure and then hide her life from others? What is lying behind your name and date of birth that you don't want others to find out?



What has Soheila Amintorabi, born in Dey 1343 (Iranian Solar Calendar), January 1961 (*translator's note: the conversion of the year in the original text is wrong and it must be 1965*), done that she is so worried? What financial and non-financial activities have you hidden under this name that you do not want to be disclosed? Which part of your past are you hiding? How can you, who cannot tolerate seeing your real name and the date of birth revealed, proclaim exposing and disclosing this fact and that fact and clarity?

Don't hide behind the concept of "privacy". Privacy has a different meaning for people like you. It is our right to know who our activists are and what goals lie behind their activities. Name change has a legal definition. If you had registered your human rights companies under the name Shadi Amin, then you would be completely right; however, you have registered all your companies such as "6Rang" (6 colours) in public references under the name of Soheila Amintorabi. In all registered cases, it is Soheila Amintorabi who is responsible not the name Shadi Amin.

Is Wikipedia good enough only when you line up your unseen and unheard films and books in it? Then does it become bad when only one sentence of truth is written in it about the truth of your life and then it must be stifled?

I will send a copy of the Wikipedia page, which you tried to change with your virtual military campaign, to Justice for LGBT; also, I will ask Wikipedia to remove the lock of censorship and feed the folks with true information. Stop censorship, distortion and inducement of facts.

Wikipedia User haghightat123 (*translator's note: haghightat means truth*)

Name and identity of sender is protected with Justice for LGBT

Ms. Shadi Amin can refute this claim by sending a copy of her ID card/ passport or send her explanation for adopting an alias to Justice for LGBT

Source: <http://justice4lgbt.com/?p=361>

Certified Translation of Article in Farsi in 2 Pages.

TRUE TRANSLATION OF ATTACHED FARSI DOCUMENT IS CERTIFIED.

Toronto, Ontario, Canada, September 15, 2016

Alireza Dorostkar

Certified Translator (Association of Translators and Interpreters of Ontario, ATIO)

Certification No. 3110



(Handwritten signature)



Dorostkar
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CERTIFIED TRANSLATION

(Persian/ Farsi into English)

NEW MAIL IN: YOU ARE A HOMOPHOBE AND ANTI MALE, MS AMIN

June 23, 2015 [General Reports](#) [No Comments](#) عدالت



Soheila Amin Torabi (also known as Shadi Amin)

When you happen to be a member of sexual minorities, you sure have a story to tell others on how you started to realize your orientation, came out of the closet, embraced your orientation by your very own self and accepted that you belong to a minority. After all this self-realization, there are still other categories to fall into, even if you don't want to, and others will push you towards a particular direction so that you can be categorized or labeled as desired by them.

One may choose to stay quiet, just look around, try to keep oneself focused and want to stay away from crowds who intend to portray the natural homosexuality of that individual and others like him/her, as unusual and worthy of pity. They just whisper in your ears that you are all alone, you are in danger more than ever and

those people will eventually form a front to fight homophobia. This all will drive you -consciously or unconsciously- to have the inclination to get to know other people with the same kind of sexual orientation and defend your orientation more freely. To answer your most natural and basic needs, the so-called front keeps saying that you are different from others, those others are not going to understand you and you are being insulted and berated by them. Hearing some weirdest of stuff like hatred of men who are portrayed as superiority-seeking creatures is not rare. The only group that keeps injecting such ideas into your mind relentlessly is "6 Rang" (the six colors) group and its members.

You might have been a member of them yourself once, albeit a silent one who was a mere observer. At the same time, you could see that there was no cohesion in what they say. The "6Rang" (the six colors) group of Ms. Shadi Amin and its multitude of members who had gathered around to fight homophobia have been and still are spreading homophobia on a large scale: hatred towards gays, hatred towards bisexuals, hatred towards men and whoever thinks otherwise. They are the ones who call themselves lesbians but resort to patriarchal behavior; they use "berating language", biased tone of voice and unprofessional behavior, as well as nepotism, excommunication and isolating this small community.

On my Facebook page, I have asked Shadi Amin and her group numerous times to answer different questions I posed to them, but there has been no answer. It seems that the main principle of the group that claims to be promoting professionalism is to avoid answering questions that are criticizing the group. It is the principle of private messages, removing, belittling, insulting and a "you-don't-understand-it-but-I-do" attitude.

Ms. Shadi Amin or Soheila Amin or whatever name you have, WE have questions. How can someone who claims her past and her activism history is transparent and is not limited to just 2 or 10 years live under the same roof with a man for 16 years?

Perhaps we can throw in the theory of obligations and close-knit families in Iran but such a hypothesis is refuted once we note that this marriage was done outside of Iran and when you were under no obligations. Political strategy is one possible assumption we can look at here that as you yourself said, you were a Marxist and not a Chirik-e-fadaie-e-khalgh; therefore, you had to walk down this path for whatever reason. Such a claim, however, is refuted again as you have had kids in



that marriage and therefore, this marriage of yours cannot be branded as a politically-motivated move.

We can then hypothesize that you are bisexual and bisexuals -by definition- are members of the LGBT community. That is fine. But the point that refutes this hypothesis is that everybody knows how much hatred you hold towards bisexuals. Once upon a time, you did not use to let any bisexual join your Baraniha group and you refused to get into a debate with a bisexual. Even if you got engaged in a conversation with a bisexual, you would be bound to belittle them and insult them, branding them as sexual psychos who use both genders. Members of the group were encouraged not to have anything to do with bisexuals and you are still encouraging them to keep doing so.

The next theory is your and your inner circle's widespread support of being queer, saying that gender has no boundaries. This too, is rejected when you start to insult and belittle those who happen to be exactly in your position. In such cases, you state that a lack of sexual relationship with a man has driven them to swing towards women.

Ms. Amin, how far does proving and disproving of yourself go? To what lengths are you willing to go to create a climate of fear and divide among members of the community? The very individual who questions policies of the Islamic Republic of Iran and labels those who are criticizing her as pets of the Islamic Republic of Iran, has been walking closely in the footsteps of the very Islamic Republic of Iran: removing those who criticize you from your Facebook page and Baraniha group while at the same time writing paragraph upon paragraph on them. This all without them being present on there or having a slight chance to respond.

The day that the documents of that company and the financial scandal of it were revealed, your various names were mentioned. At the beginning of it, there was no response from you although your name had already been mentioned in those documents. Later, you just sent a universal message to everyone saying that I had blocked you, therefore, you were deprived of the right to defend yourself. I need to say that no one can stand horrible insults and belittling in private messages. This, for sure, will lead to you being blocked. Let us not forget that you do the same by blocking an individual in reaction to a simple criticism only. I just did to you what you do to many others. When you were told that I had been spoken to and I agreed to give you a window of opportunity to exercise your right to a response, you just



said that such people (meaning "me R.M.") are not worthy of a simple conversation!

Who, then, is worthy enough to talk to, Ms. Amin? Who is as noble as you are? It is a twisted irony of fate that a homophobe runs an anti-homophobia network. She attends conferences in different countries, keeps smiling in photos in locations that are open to everyone and not to particular people. Yet at the same time, she evades addressing uncertainties and charges surrounding her.

Although I believe that you are not a member of this community and have only joined this community to achieve fame, financial gains and sexual relationships and that you exploit others with your policy of divide and rule, I still naively assume you are one of us. You cannot help fight for women's and sexual minorities rights dressing in a suite, wearing short hair and speaking like gangs, a behavior that even men avoid. Quite the contrary, you expose us to more unwanted scrutiny of others on a daily basis.

Source: <http://justice4lgbt.com/?p=475>

The identity of the wrote is protected with Justice for LGBT

Ms. Soheila Amin can send her response to M.R. to Justice for LGBT

R. M.

Certified Translation of Article in Farsi in 4 Pages.

TRUE TRANSLATION OF ATTACHED FARSI DOCUMENT IS CERTIFIED.

Toronto, Ontario, Canada, Sept. 15, 2016

Alireza Dorostkar

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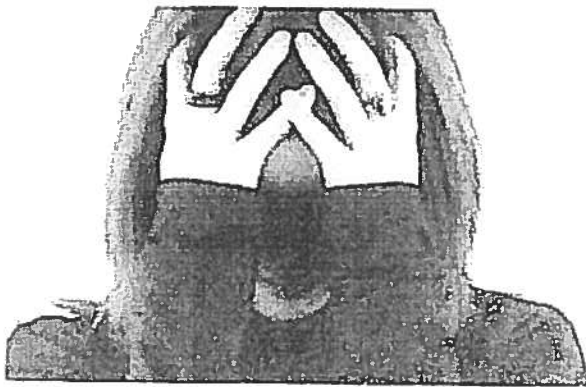
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CERTIFIED TRANSLATION

(Persian/ Farsi into English)

A Homosexual Asylum Seeker: "Our Rights are a Toy in the Hands of Some Human Rights Activists."

June 5, 2015



I wonder whether to call this piece of writing an open letter, an article or a report. However, I will try my best to depict a true picture of what is going on with us here to you.

I have sought refugee status in one of the small towns in central Turkey for longer than a year and a half now. After all, I am a homosexual and, in the past few years, it has become common practice to apply to the United Nations High Commissioner for Refugees in Turkey, and seek asylum from a third country, usually in a North American country, obtain settlement permission and wait until we are found eligible to get to the target country. While our application is being processed, we have to wait at least two years in Turkey. We are accommodated by Turkish police at Turkish villages and small towns during this two-year waiting period, do not have the permit to work, and do not receive any financial assistance from any institution. While we are unemployed and penniless during this transition, we have to pay our rents as well. Accordingly, many of us turn to what is called "black jobs". We do anything illegal to get a mouthful of

bread. Sometimes, when employers get to know about our situation, they deprive us of even a slice of bread.

Many of us enter the limbo of waiting period while having a dark past behind. Each of us is running away for a reason. One is running away because his/her sexual identity has been revealed to the family; another one has been disgraced at work in the middle age; another person has had a sex change and ostracized by the society; another one has been forced into getting married and so on. In short, when we arrive in Turkey, we are screwed, sick, weak, and we have lost everything. Under these circumstances, we have to build up a new life.

When I made up my mind to leave Iran, I prepared myself to face all the troubles my friends had told me about. I left because they wanted me to marry a man. I was from a traditional family and my sexual orientation was the secret of my life. I could not reveal it, nor could I accept their offer of marrying a man. Therefore, I gave up my job of teaching at a university, auctioned my belongings and left Iran. The first few months were the same as I was told about before: hard work, poverty, taking shelter in storage rooms and basements, being scorned at small and traditional towns and the very slow nature of processing refugee application. All this is depressing and sometimes heart-rending. A couple of months following my departure from Iran, I faced another problem piling up on the other troubles. This problem made me write the present letter:

In these small towns, for the reason of not knowing the language and being isolated from the Turkish community, asylum seekers usually socialize with each other. During the time I spent with homosexual asylum seekers, I figured out that different groups of asylum seekers mention different individuals' or groups' names in Europe or America who have established organizations for the protection of rights of homosexual refugees or homosexual and transsexual refugees. They claim that by having recourse to these organizations, one can speed up the process of refugee status. These organizations also arrange training, psychotherapy and lifestyle courses during the process in order to prepare asylum seekers for settlement in the target country. In other words, they raise awareness by teaching about "our lost rights" in Iran.

Without making a pre-judgment, and only because I had heard of the name of one of these organizations and its managers who constantly appeared on Persian televisions stationed abroad as human rights lawyers and activists, I decided to attend their classes accompanied by a friend. These individuals and their colleagues were supposed to leave their place of residence in Europe for Turkey and arrange courses in various towns across the country. Invitation letters indicated that these courses would aim at individuals' rights in life. This was thrilling news in our excitement-free and monotonous life. It was exciting to meet these so called "activists." I had personally spent years in teaching and loved classes and courses. The countdown for me to attend a class again began.

Classes started. God forbid! Do you call them classes? Courses? Multiple-day courses were held at the hall of a public building. Famous persons and activists that I knew had whiteboards,



books, etc. with them, but imagine what they taught us. They got involved in hate speech to the best of their ability. The class went entirely on backbiting and talking about other groups and organizations: "Do not follow X group protecting homosexual rights. Its director is a thief." "Do not follow that lady who is not a homosexual at all. She's a big liar." "Do not go to Mr. X. We have the file of his complainants suing him for rape." "If you contact group or organization X, US Embassy in Canada will postpone your refugee application."

It was heinous. Fear filled me from head to toe. Are they right? They have covered such a long distance to say these things? What the heck is this class? There were young boys and girls attending the class who obviously hated the persons named during the course. Worst of all, these activists imposed their old political ideas on individuals. They were politically attached to one of the armed organizations developed at the early Islamic Revolution having no fear of talking about their past experiences. When I challenged their political beliefs in their so-called "human rights" class relying on my education, they said: "You have just arrived from Iran, born yesterday! The world is in such a situation we describe."

Remember the classes were meant to teach us the way of life? Titles of all courses were all grandiloquent. The course on "Equality of men and women", for instance, focused on accusing male human rights activists and praising themselves. Misandric tone of one of the teachers and activists was so strong. Later, I figured out that this so called "homosexual rights activist" had also had a spouse of the opposite sex whose life with her husband and children had ended up in divorce after years of living together in Iran. At the end of the course, they handed over a letter to us to sign indicating our attendance in and satisfaction with the classes.

One of the directors of this "educational workshop" later claimed that the seminar would include private psychotherapy counselling meetings or as they termed it "lifestyle." I was bewildered and in surprise, and soon it was my turn to go into the meeting with that counsellor. When the door opened, there were three persons standing and a camera was rolling. I was surprised! The counselling session was supposed to be private.

Later the counsellor told me that session was recorded and the video might be used in the future for research purposes. I said I was unhappy and did not expect it. I was supposed to go there to improve my deteriorating mental health, not to be a subject in their film! I was feeling like a person behind bars forced to confess. I was hesitating whether to sit or leave the room when I was told, in a threatening tone, that my sitting in front of their camera meant guarantee for the acceptance of my case. I said, "This is not a counseling session! You said you would give counseling! Do you have the skills and knowledge, by the way?" The counsellor laughed and replied: "Haven't you seen me onTVs? Thousands of people are dreaming of meeting with me." I was scared, but I left them and did not comply with their request. I was nervous and could not believe to have escaped from the claws of the Islamic Republic in Iran and been trapped by these individuals who, for the reasons unknown to me, wanted to put me in front of the camera and take advantage of me. How do they claim to be democratic and supporters of



human rights while they show no respect for my right of "privacy" of life, and just as the Islamic Republic, they gain their power in suppressing other groups.

Later I heard from other friends that each one of them would be put in front of the camera of this activist, tell their life stories, and then there was no counseling at all. In spite of the fact that we were told the videos were made for research purposes for which free counseling would be offered, later I found out that they were shown at various meetings of international organizations that give financial support to human rights groups for the purpose of collecting financial aid for the said organization, which claimed to hold "educational workshops for refugees."

I am not convinced that those youngsters knowingly sat in front of the camera knowingly. Would their pure spirits irritated by their families and society have the discretionary power to judge what they heard in these workshops or would they turn to eternal discontented and upset individuals as a result of the teachings of this organization which are filled with hate and agony?

In any case, a short while after they left, a new group arrived in our town. In the small homosexual community of our town, news spread that this group was not in a good relationship with the previous one. I remembered that a member of this group was called "a thief" by the previous group. With the horror carrying over from the previous meeting, I attended a seminar held by the new group at one of the refugee's home. All attendees were trying to somehow convey to this group what had gone on in the previous workshop. Therefore, all the time of the meeting was spent by the new group denying the charges made against them regarding their theft and looting. The director of the organization regretted having had to spend his/her time denying the accusations stating that if the previous group had not acted like that, they would be performing their duties much better.

One day, while I was at the seminar of the new group, I received a note from one of the organizers of the previous program which gave me goose bumps. They were following me like criminals. The activist's note read: "Don't bite the hand that feeds you. If you disclose the materials discussed in the free workshop you attended to the other groups, you will be liable to prosecution." What workshop? What materials? What he meant was I should not disclose to anybody what happened to me and that I was threatened!

I was bewildered. I could not imagine I was taking refuge to such individuals from the Disciplinary Force, Basij (Mobilization Resistance Force, militia affiliated with Islamic Guards Corps), Islamic Guards Corps and Ahmadinejad and his followers. I could not believe I was a toy for them. I could not believe they were receiving financial aids from international organizations and groups but spent it all on hatred and collusion.

This bitter experience I had in the very early months of my stay in Turkey made me decide not contact any groups. Two months later, while I was still recovering from that bitter experience that made me suffer mentally and physically, my phone rang. Somebody who introduced



himself/herself as homosexual rights activist residing in another country – the same person I had heard about during the first workshop who was said “not to be a homosexual at all misrepresenting himself/herself in old age for money” – told me in a calm tone that s/he was aware of what had happened in the past few months. Evidently, tales had been told...Later s/he told me that these incidents could hinder my “asylum process” and, therefore, I had better file a complaint against these organizations and send it to him/her to follow up. No way! I had vowed never to do it again. Not even thank him/her for this unwanted favor; I hung up.

Even though all these groups claim to be financially independent, in the worst case stating that that they operate on public charity, obviously they receive “humanitarian” assistance from western countries, the same budget allotted by western countries including the United States to the promotion of human rights and freedom of expression to be spent in countries such as Iran. It goes without saying that these aids would have been extremely useful if they had reached the right organizations and spent in an appropriate fashion! Now I well understand why the situation remains basically the same without one single incident!

To qualify to receive these aids, such big words such as holding workshops on promotion of the rights of homosexuals, women’s rights and human rights are pompous enough; however, do the sponsors of such organizations simply rely on reading proposals and financial reports of these organizations? Are they convinced by seeing pictures and videos taken by force continue to sponsor such programs? Are they aware of the painful backstage of these activities? Have they ever wondered why the situation continues to be fundamentally the same despite the fact that millions of dollars are poured into these activities? Have they heard of the asylum seeker who innocently committed suicide while an inter-organization fight arose during one of these seminars in Turkey and nobody even inquired about him/her? Do human rights activists and lawyers squandering thousands of dollars provided by western governments on fights among themselves know that if they got involved in a true fight and if there were a counselling, s/he might have never committed suicide? Is their duty locating the most helpless and provide them with instant assistance or taking advantage of the weakest and most vulnerable members of society?

Have the sponsors of these organizations ever researched about the past history of these individuals? Do they ever know that, knowingly or unknowingly, they are involved in the encouragement and promotion of violence and in changing individual efforts (such as tendency to learning and education on part of the asylum seekers in workshops) into collective feuds (pitting asylum seekers against one another)? Is the eligibility of these individuals assessed for the job they claim to be doing? These individuals might not be at all prepared to provide assistance to others due to the problems stemming from their past, social violence, domestic violence and so on, and their acts might be attributed to disorders arising from vicissitudes of life rather than inclination to change and promotion of truthfulness.

Assisting asylum seekers and holding workshops and seminars is grandiloquent. Isn’t there anybody responsible to come and see what is going on? Do they ever check to see if they have

personal problems or not? Do their sponsors ever go to see if these individuals are qualified and prepared enough to be able to assist others? What they do does not signify contribution to human beings and their rights. Their activities remind one more of the situation of disintegrated parties at the early days of Islamic Revolution in Iran than a step to help human rights. They are involved in mudslinging to promote themselves. People are nothing but a plaything for them, a plaything for their groups, and their favouritism, and a means to satisfy their lust for power.

Reference: Khodnevis website

Our reference: <http://justice4lgbt.com/?p=201>

Certified Translation of Article in Farsi in 6 Pages.

TRUE TRANSLATION OF ATTACHED FARSI DOCUMENT IS CERTIFIED.

Toronto, Ontario, Canada, Sept. 15, 2016

Alireza Dorostkar

**Certified Translator (Association of Translators and Interpreters of Ontario,
ATIO)**

Certification No. 3110



A handwritten signature in black ink, appearing to be the name "Alireza Dorostkar".

ENGLISH

گزارش دهید

گزارش قربانیان

تماس

دریاره

THAT BED WITH PURPLE COVER AND COLOURED WALLS

November 23, 2015 | English | No Comments | عدالت



I was hesitant whether or not to write what was bothering me for a long time. A wound was about to open up. The infection was intolerable, yet I did not dare to let the putrefied infection out. I was so hateful toward this infection that I was carrying within me. Similarly, I was terrified of letting the wound open and the pus come out. Perhaps she herself is an embodiment of homophobia, inasmuch as there are many lesbians who have deeply hurt by her

Who have believed if I had spoken out? Every hour of every day I carry a chronic infected wound like a hunch on my back. Every day I am more worn out than the last. I think to myself, how many have seen that bed with a purple cover and colourful walls? For how many, after making love, has she made cafe latte, and has entered to the bedroom from the kitchen with one eye half open singing "love...u?" Even though she has never known love. to how many has she said "we are the only good ones, none other"? To

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how many has she said "I am number one"? To how many and in how many ways has she implied that others are no good? She is not a good comedian, She brings tear to people's eyes

My head becomes heavy when I think of all the contradictions in her. Truly, how many faces and facades does she have? ha

When I read the article in Khodnevis Website, even though I could hear her breathing and was disgusted by and fearful of it, I asked myself with what price did BBC Persian invite her to their programs, and how could those watching inside the country find out the truth? One's true face cannot be seen on the television screen. I remembered someone who said she was a refugee in Turkey and she had started an intimate relationship with her, and after sleeping with her, she put her aside like a dildo. How many have told me about her bedroom and its details, and must keep their painful silence forever. How many has she fooled with her showmanship on the internet camera and lured into a two way, but temporary, relationship? and who is aware of that hidden camera

To how many has she promised a position, and when their expiration date came about they were tossed onto the forgotten land. Even so, how many moderators are needed for a closed Facebook page

She was supposed to give me consultation, but she slept with me, just like she slept with all of them. She hated gay people and loathed bisexual people. The hero of her bed was always herself

Everything began with trust. Everything begins with trust. Then you realize you were a mere object to her... then denial... then... then threats... then silence... then isolation

The relationship she started with me as a human rights activist for LGBT people was rape. She is raping me emotionally every single day. I think to myself that she only cares about her bank account, and the long list of names with whom she has shared a bed. She hates men but her behaviour and cliches are revolting, chauvinistic and lumpen attitudes. How many people did she belittle and

destroy. One day I will speak out. I will stand strong and I will reveal this. I will force her to look at herself

Name and particulars of the sender are kept in confidence with Justice4LGBT

Picture is for display

Given that we do not have independent verification of this statement, we have withheld the name of the sender

Justice4LGBT is willing to provide documentation to relevant organizations

This document is translated by 6Rang volunteers and Justice4LGBT received it by email

REPORTS



نامه دریافتی:
این سازمان با
همکاری آن
سازمانم تقدیم
می کند



طنز دریافتی: به
خدا اگر تشریف
نیاورد ناراحت
می شوم



سایت بیک ایران:
نقدی بر کتاب
جنسیت ایکس



گزارش دریافتی:
وای به وقتی که
بگردد نمک!



خانم امین،
هذیان نگویند



مطلب دریافتی:
یک بیانیه و نشن
نکنه

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درباره تمامی گزارش قربانیان گزارش دهید ENGLISH

SCHEDULE F

----- Original Message -----

Subject: Ms. Raha Bahreini's Conflict of Interest
 Date: 2015-08-11 16:25
 From: Justice4LGBT <info@justice4lgbt.com>
 To: Philip.Luther@amnesty.org
 Cc: Bahareh.Javis@amnesty.org

To Amnesty International
 Director of Middle East and North Africa

Dear Mr. Luther,

I am writing this email in regards of Ms. Raha Bahreini who is working at Iran's desk at the AI and her relationship with Ms. Soheila Amintorabi (Shadi Amin) and Ms. Shadi Sadr and her conflict of interest which is very important for us.

As you might know, Ms. Bahreini has a close relationship with Ms. Amintorabi and Sadr and their companies Justice for Iran and Grang. She wrote their paper in English name Jensiyyat-e X which we have received a lot of complain from Iranian LGBT community and those who have participated at those interviews. They claim that their interview responses were doctorate and it is not what exactly they told. Ms. Bahreini is their key lobby at the Amnesty International in order to promote their agenda.

We have recently published a lot of reports and letters that we received from Iranian LGBT community members on the wrong doing of Ms. Amintorabi and Sadr, their abuses, rape, bullying and money laundering and etc. in Farsi that you can check them out at our website (www.justice4lgbt.com).

We would like to bring this into your attention and request you to advise Ms. Bahreini to follow the AI and other international organization's policy to remain non-partisan and neutral and avoiding any kind of favouritism while she is part of the Amnesty International.

We believe AI is playing a significant role to support victims of human rights violation and it is our responsibility to report these wrong doings to you otherwise, AI and those victims of violation will pay the cost of mistrust if Ms. Bahreini and other people in her position does not follow the policies. We informed that she is going to speak at a panel on August 13th which organized by Ms. Sadr and Amintorabi in order to clean their mess and claim that everything is fine by using (abusing) other organization and individual names such as AI to show that they have a large supporters and they are legitimate.

Thank you so much for your consideration in advance and looking forward to the day that Ms. Bahreini cots her relationship with them and remain as one of the valued member of AI.

Dr. Milamad Eslamdeh
 Justice4LGBT

Minoo Homily
On Mobile

Arsham Parsi
July 23, 2015

Hi Minoo jan, I read your article on Akhbar Rooz. I want you to review my latest blog post about personality destruction and why I am against it including my last Facebook chat with Ms. Shadi Amin. <http://www.arshamparsi.net/?p=1804>

Our Current Pain
Arshamparsi.net

Arsham Parsi:

I always had special respect for you and still do. I do not like it when people use others and their credits to exonerate themselves. Ms. Amin must have responded to the folks in that manner only in your presence, while at all other times she has been bad-mouthing them and proof of this is on her Facebook in the posts made by her which can be seen in the post.

Minoo Homily:

Mr. Parsi, I am not an idiot to allow anyone to use me. I am the one who introduced you to the UN while [you] a refugee. By the way, my article was in defence of Shadi Amin's reputation and the anonymous accusations against her. One would expect that you too should stand up against defamation of other activists. I have continued to remain silent with respect to the complaints by the refugees against you. I hope that you can prove their falsehood by changing your ways.

Arsham Parsi:

Dear Minoo, I did not say that you are an idiot and did not deny that we went to the UN together. I just wanted to mention that what you say is true but Ms. Amin has engaged in these unconventional behaviours and I have shared the screenshots her offensive and defamatory writings against me.

If any refugee has any complaints against an organization they are dealing with, of course there are formal avenues for launching the complaint and dealing with same by the board of directors of the organization; they indeed exist in our organization.

These allegations that you referred to as anonymous all have names attributed to them and I have had opportunity to verify some of those accounts as they contacted me and I looked into them and some of them of course remain unverified. Definitely, I too will stand up against defamation of activists and my intention from my message was to convey that it is not right for someone to condemn an action that he or she engages in. Ms. Amin should not defame either. For example she has written that I have involved my family members in my fake organizations. You are in Toronto and can easily access the list of the board of directors of our organization,

which is publicly available and can be accessed through the CRA, and note that none of them have a family relationship with me.

Mino Homily:

Mr. Parsi, if you have investigated and verified any of the articles prior to publication, please let me know which of the articles have been verified. It remains a question for me why after the investigations and verifications the articles are still published anonymously. The refugees in Turkey do not know about the formal complaint avenues and discuss their concerns with those whom they trust and I was the one they trusted. Also, I didn't write that I went to UN with you. I introduced you to the UN. I hope these days end.

Arsham Parsi:

Dear Mino, I did not investigate or verify [the articles] before their publication as I have no connections with Justice4LGBT. I looked into them after they had already been published and because of the trust [in me] that exists for many. After a campaign was launched that those articles are baseless, some of those victims contacted me personally and asked me to confirm their stories. Letters about the breach are true. The story of putting pressure for getting "Likes" is true, and so are many other stories related to the refugees. Those financial reports and company registrations have links to the UK official organizations and are outside of my area of expertise and they are not very important any way. I am surprised that as someone who has worked with vulnerable people for many years, why you would question the reason they publish anonymously. If they had written their names, by now a lot of pages had been created to destroy them. Now that they are anonymous, a group of people are being interrogated every day to find out for example who Sh. Kh. is. It is obvious what would have happened to them if they had written their names. Yes, it is possible that some refugees in Turkey may not be aware of formal complaint avenues but those who are in contact with us and participate at our regular meetings in Turkey are told about these complaint mechanism at the end of every session. Also, you should know that many refugees, because the psychological traumas they have experienced, are hard to satisfy and have very high expectations and often complain about everyone including yourself, but those complaints aren't necessarily true. For example those refugees that you met with and posted their picture, not only all of them received services from us but they also received financial aid on a monthly basis but always said things to imply that they are not receiving any aid from anyone.

Arsham Parsi:

In relation to the UN, if by correcting me you are implying that for the first time that we went to UN together I was a refugee, then that is correct but if you mean that you have been the reason for my relationship with the UN and social credit and success, then you are only being too kind as I was in contact with the UN even before I left Iran and was helping refugees which were much fewer than now.

Yes, for the first time I went to the UN with you and a gentleman who came from Australia. After that I had numerous meetings with UN and other organizations and received several international awards for my successful activism. When you were in Turkey and were telling the

same things to other refugees, they told me about it but I did not want to contact you because I honestly did not know if they were exaggerating it. But now that you insist that you were the reason that I became successful, I only smile and thank you because everyone knows how hard I have worked for my achievements. I hope you be happy and not repeat these words in front of others as they are distasteful and may be interpreted by others in unpleasant ways. I always respected you and whenever anyone complained against you I tried to explain how difficult it is to work with refugees and their assumption about people including about you are not true.

Minoo Homily:

Why don't you help the victim of the breach with launching a complaint? I haven't heard about the letter about the "Likes". Why don't you publish it yourself and why don't you stand up for the Breach letter if you are sure of it. The most important thing is to protect the victim. If you provide me with your evidence, I (Minoo Homily) am prepared to stand up for the rights of the victim. Do you mean Soheila Torabi Nia or someone else?

Minoo Homily:

By the way, I have been a volunteer for 15 years and I have a clean record. Please do not drop the ball in my court.

Arsham Parsi:

Dear Minoo, when that individual is in Iran, where can she/he should go and file a complaint? Have you even worked with those who have been wronged? Have you ever dealt with a victim or not? You speak like someone who does not have any experience. Who has ever brought evidence of wrongful behaviour?

I stand behind the Breach letter and I even shared it on my Facebook. I am in contact with that individual and I introduced her to a few counselors. On the day that I was the Khodnevis editor, I published another letter and after that I officially discussed several times. Do you have enough knowledge about everything that I do when you say why I did not do anything? This is exactly what I meant when I said that people's lack of knowledge are being used and there is an essay club for Ms. Amin. If you want to support a victim you should have sympathy first. It is like someone says that I got hurt by the IRI and you reply that these days there are a lot of rumors against the IRI, while the IRI is doing a good job and these tacky and anonymous people lie and should go to court if you have documents. I know that you will say that it is not like this, but be honest with yourself and think about it. You do not need to give me any answer. You will see that you defend Shadi because you are her friend and it is not important the rights of how many people will get violated. If I am wrong, have you contacted anyone to see who these people are? Have you heard their stories? What investigations did you do that led you to believe that these are rumours against Shadi? I have no personal problem with Shadi Amin and I even like her and I like her work but it does not mean that I should ignore the rights of others due to my personal relationship. I stand against violation of rights and that is why I am successful. I invite you to investigate and make contact, try to find these victims, find out if these were true or not and then take sides so that we don't end up in a situation where

someone says that an activist woman was violated in prison while many are defending the prison guards and the regime that she is lying and is trying to taint the regime's reputation.

Arsham Parsi:

With respect to your 15 years of working as a volunteer, I personally thank you, kiss your hands as a sign of appreciation and say kudos to you. I am officially the employee of my organization but I am not getting paid because we spend all money for projects and you may see our financial reports on our website. For example last year I only received a \$5,000 salary because we did not have money and I do not have any other job and I have a difficult life but helping others is more important to me. Otherwise I could go to work at Super Khorak and get at least \$2000/month. I do not drop the ball in your court because I never liked to play ball. All I'm saying is that if you have heard, we have heard too but professionalism requires what is heard to be investigated and verified and not be repeated otherwise.

Minoo Homily:

Thank you for your explanation. I prefer to end this subject.

Arsham Parsi:

I am happy that you understand.

Have a good day and looking forward to see you

Minoo Homily:

Ending the subject does not mean that I accepted your points.

Arsham Parsi:

Ok. Just as a joke, Dear Minoo, there is nothing else for you to say since I know you took sides without looking into it. Kiss

Minoo Homily:

Mr. Arsham do not use any polemic with me. Know your limits and drop your sexist tone. The truth is clear to me and please respect your and my time and consider this conversation finished.

Arsham Parsi:

Sexist message? With you? Hahahahah, have a good day.

Shadi Amin:

4 hrs. Edited

Avoiding fights with the pigs

Even if for once they had launched such campaign for the sake of improving refugees' conditions in Turkey and had they complained to "concerned authorities" about the hardships sustained by the LGBTs in Turkey and during their asylum period, we would be in a better-off position now. Instead of launching empty campaigns and total accusations of human rights activities whose background is clear and bright, stop threatening refugees for "not giving" ineffective endorsements.

Stop your power show off for deciding the future of the country and refugees. If these refugees are surrendering to your words, it is due to the contacts you have and are exploiting with the United Nations High Commissioner for Refugees (UNHCR) in Ankara. A relationship through which you have created a fake image and one that has always caused fear and shock among refugees.

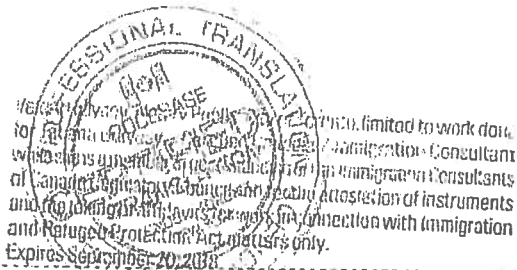
Dear Sir, because of a deteriorating romantic relationship of a refugee woman with your sister, you should not leave the transfer case of the lesbian woman half way through.

I am happy that years before after having worked for fifteen years in the refugee field in Europe, I decided one day never to work in this field again. Now, I understand why that decision was a correct one. The filthy atmosphere resulting from the created sicknesses of the Islamic Republic compounded by wrong behavior and ethics of some of these people who have been suppressed and driven from their homes and shelters, allows sick people to misuse their position as "manager" and in charge of their individual and self-founded organization and their only task is clashing with other organizations and groups. Of course, they possess vast experience in such "struggles". Years back, the internet atmosphere witnessed clashes and insults of this individual with his rival and one of his colleague who had dared to leave him and was in opposition with his methods, financial and commercial policies in particular the issue of refugees. This time the tiding is turning in someone else's favor so that they [Incomplete sentence]

This time the tiding has turned in someone else's favor and these people who do not have other topics for news want to be on top of negative headlines and filthy rumors for some days by engaging with imaginary individuals and casting doubts amongst honest activists of this field. A handful of indifferent people who also recruited their family members into bogus organizations and for years have been eating the "bread" of the refugees with "butter and jam".

These are the people whom I had for so long avoided to be friends with on Facebook.

I hereby request all my refugee friends and honest activists of this field not to enter this game since Bernard Shaw had wisely stated:" never wrestle with a pig. You get dirty, and besides, the pig likes it."



Certification of translation

This is to certify that this translation from Farsi to English was made by the undersigned Sedrick Bernstein who is conversant with these languages, and that, to the best of my knowledge and understanding, this is a true and complete rendition of the corresponding original document.

Signed [Signature]

Sworn before me at the city of Toronto this JUN 22 2016

Notary public [Signature]

Leila Heidari-Faroughi

Certified Translator ID # 2944

Association of Translators and Interpreters of Ontario (ATIO)

(HTTPS://WEB.ARCIIVE.ORG/WEB/20150619040336/HTTP://WWW.ARSHAMPARSI.NET/?P=1771)

The tale of stick and the thieving cat

When we review it again, all will become clear: On May 17, the International Day Against Homophobia, we proudly published several articles, contents, video clips and statements-of-sufferings. Well-known political, social, culture and art personalities made our day by supporting us. What did you do? You contacted some of the authors and producers of the articles, interrogating them. "Are you willing to work for us? If you don't; we will do this and that, there will be consequences". And you did not contact them once or twice, you did it numerous times and each time your tone became harsher and more threatening. You wanted to make sure that these artists, writers and the new generation of intellectuals will no longer dare to be active. You're delusional!

We stood up to you. We issued statements to show your hand. We discreetly and honourably asked why you did such things. Without naming you, we wanted you to retreat and stop these anti human right activities...what a great shame that without picking up the stick; the thieving cat ran off and revealed itself [Persian idiom]

Your answer to our honest request was just like Ayatollah Ahmad Jannati's speeches in Friday prayers. When the world is telling the regime not to kill and he answer back by swearing. As a friend, we advised you not to make your case heavier but you insulted us on Facebook and used vulgar/sexual language? Insulting our families?

You investigated my newly-wedded sister's salacious imaginary relationship and want to to prove that you are not an interrogator?! You, with all these abilities and capabilities, can replace Hossein Shariatmadari of Kayhan [notorious Iranian hard-line editor]. Are you a human rights activist or a human rights vulgarist?! Are you really a women's right defenders while you, like the most patriarchal men, imagine/visualize bedding your critic's sister?! In fact, one should re-learn from you the feminist literature. Don't make pig's name dirty as a pig is more feminist, better human rights activist and more fair-minded than you.

We are noble but we will not cower under force and intimidation. In the past week, how many activists did you threaten and interrogate? Yes, the outcome of paddling in a swamp is death.

Accurate, authentic and complete translation from Highlighted parts of Persian copy is certified.
Date: December 6, 2017

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