

**Dr Matthew Thomas Parish
40 West End Avenue
Harrogate
North Yorkshire
HG2 9BY
England**

**parish.matthew@gmail.com
+381 63 884 2659**

Jimmy Wales
Founder and Member
Board of Trustees

Natalia Tymkiv
Chair
Board of Trustees

Wikimedia Foundation
1 Montgomery Street
Suite 1600
San Francisco
California 94104
United States of America

16 February 2022

**BY EMAIL: legal@wikimedia.org
info-en-q@wikimedia.org**

IN CC TO: info@ipt-uk.com

Dear Sir / Madam

**High Court of Justice, London
Case No. PT/21/13/H**

Matthew Thomas Parish v Wikimedia Foundation (1) The directors officers and Board members of the Wikimedia Foundation (2) “Cordless Larry” (a pseudonym) (3) persons and/or entities unknown (4) Government Communications Headquarters (5)

**Wikipedia Entry: [https://en.wikipedia.org/wiki/Matthew Parish](https://en.wikipedia.org/wiki/Matthew_Parish)
Complaint of defamation**

**Threatened application for a *Norwich Pharmacal* Order against various administrators and/or editors of the Wikipedia encyclopaedia, established and controlled by the First and Second Defendants
Proceedings before the courts of England and Wales**

1. I am the Claimant in the High Court of Justice Investigatory Powers Tribunal Case No. PT/21/13/H in London, England.
2. That matter involves involves a complaint about the participation of certain persons and organisations in a fraudulent conviction before the courts of Geneva, Switzerland in which five persons, including me, were convicted of charges that did not appear in the indictment; they

were not allowed to call witnesses; and not of the “sentences” were executed. The undersigned was not even at the trial; he was tried in absentia.

3. A summary of the matter appears in the following PDF copy of a Wikipedia draft article:

https://d085b3be-2bc3-46ba-b3cf-cf0b6e23d977.usrfiles.com/ugd/d085b3_0a21899853de45cea4167602a5fbbec.pdf

4. That is an image of an original draft Wikipedia called “Kuwaiti videos affair”. The original was preserved in case it was edited later; and indeed it has been. You can find the edited version at:

https://en.wikipedia.org/wiki/Draft:Kuwaiti_videos_affair

5. In November / December 2021, a series of defamatory additions were made to the “Matthew Parish” page. You will be able to see when and by whom they were made by looking here:

https://en.wikipedia.org/w/index.php?title=Matthew_Parish&action=history

6. The defamatory amendments are as follows:

First paragraph second sentence:

“

In September 2021, Parish was sentenced to three years in prison for his role in a fake arbitration in a dispute between rival members of the Kuwaiti ruling family.

”

Legal issues subsection:

“

Parish has also been indicted for his alleged role in a fake arbitration in a dispute between rival members of the Kuwaiti ruling family about the authenticity of videos showing corruption and breach of Iran sanctions.^{[21][22][23][24]} AP reported in February 2021 that a court hearing had been held and adjourned until August 2021.^{[25][26]} In September 2021, Parish was convicted and sentenced to three years' jail time and was banned from practicing law in Switzerland.^[27] As AP reports, "Judge Gonseth said he was an arbitration expert and 'manifestly' involved at all stages of the process.^{[28][29]}

“

7. I reversed those amendments, explaining they were false, misleading, out of context and of course highly defamatory, particularly for a lawyer; and I replaced the defamatory text with something more reasonable, neutral and balanced. The reason why the original defamatory amendments were so outrageous is explained here:

<https://www.the-paladins.com/post/associated-press-bad-journalistic-standards>

8. However those edits were reinserted by a Wikipedia administrator called "Cordless Larry". I also complained to the Wikimedia Foundation Legal Department. Here is a copy of the correspondence I had with "Cordless Larry":

https://d085b3be-2bc3-46ba-b3cf-cf0b6e23d977.usrfiles.com/ugd/d085b3_8457bf97e0944c29905cd657adcecc2c.pdf

9. And here is a copy of my correspondence with the Wikimedia legal department. Hence the Wikimedia Foundation has been fully advised of my complaint of defamation. To date you have declined to do anything about it.

https://d085b3be-2bc3-46ba-b3cf-cf0b6e23d977.usrfiles.com/ugd/d085b3_2f680bf2ba3c4551b36e1ea9fc406838.pdf

10. As you will observe, "Cordless Larry" advised me to resubmit my amendments on my "Talk" page. However when I came to do that yesterday, I discovered that my Wikipedia account had been blocked; and I mean, blocked to the extent that I could not even insert comments on my own talk page, thereby prohibiting me from following the advice of "Cordless Larry".
11. Hence my Wikipedia entry page continues to contain appalling defamatory information, in manifest violation of the Wikipedia living persons biography, that it is now out of my power to do anything about even though I have been advised of a procedure for amendment by "Cordless Larry" that I cannot use because I have been blocked.
12. The Wikimedia Foundation is fully aware of the matter, it having been brought to the attention of the Wikimedia Legal Department previously; I now ask the Wikimedia Foundation to apologise, delete the defamatory material, replace it with my material or some other appropriately neutral and fair material; and offer to make amends in the amount of GBP10,000 pursuant to sections 2 to 4 Defamation Act 1996.

The identity of "Cordless Larry"

13. I would like to make some forensic observations about "Cordless Larry". He is by far and away the most active Wikipedia "volunteer" administrator. Indeed he seems to work virtually 24/7, forensically editing any foreign political articles so that their perspective is more in line with that of the British government. It is impossible to imagine that he is a volunteer; or even that he is a single person. His output too massive and too concentrated in specific areas. The only reasonable inference to draw about "Cordless Larry" is that he is an account on a computer inside government offices whose actual user changes (nobody can work 24/7 doing nothing but editing detailed Wikipedia articles about foreign political events; nobody could have sufficient knowledge to do that still less be stuck at their computers for such long hours). "Cordless Larry" is probably an account at GCHQ, the British intelligence service based in Cheltenham.

14. It is perhaps to be expected that a major country's intelligence services is manipulating an open-source internet encyclopaedia such as this, which is so influential in assisting people to form their opinions about subjects in the modern age. But where "Cordless Larry" and his backers fall into illegality of the worst kind is where they use their information technology skills intentionally to defame a British citizen and an English solicitor. If they persisting in doing that, then they must be exposed and sued. That is because English law does not permit the government, even its clandestine services, wantonly to defame an officer of the Court. There can be no public policy justification in doing this; it is contemptuous of the English court that supervises English solicitors; and it is also unlawful. GCHQ and the various employees posing as "Cordless Larry" are not immune from English defamation law. Either they will correct themselves, or they must be exposed to its consequences.

Norwich Pharmacal request

15. "Cordless Larry" is responsible for inserting contested grave defamatory materials upon my Wikipedia entry. He did this when he reverting my amendments deleting such defamation and replacing it with more neutral text, and then refusing immediately to correct the situation, notwithstanding that I had warned in my commentary removing the defamatory material why it was defamatory and unfair and had to be deleted.
16. Accordingly this person (or persons) using this Wikimedia administrator's account is liable in English law for defamation. The jurisdiction nexuses are: I am an English solicitor; I am resident in England; I have a reputation in England; "Cordless Larry" is in England; existing High Court proceedings about the same matter exist in London. If immediate settlement is not obtained with both the Wikimedia Foundation and the person(s) identifying themselves as "Cordless Larry", then it will be appropriate to add those parties as co-defendants to the existing High Court litigation.
17. In order to sue "Cordless Larry", I need to know his true identity and coordinates. The identities of the Wikipedia administrators are anonymous to the general public. Only the Wikimedia Foundation knows who they are.
18. The Wikimedia Foundation is obliged to tell me the identities of people who have been using its platform to defame me, so that I may pursue those people for defamation in the High Court in London.
19. The relevant case law which provide the High Court in London with jurisdiction to compel persons in the position of the Wikimedia Foundation to reveal the identities and coordinates sufficient to sue third parties with whom the Wikimedia Foundation has become mixed up (i.e. their administrators and editors) is called *Norwich Pharmacal Co. v. Customs and Excise Commissioners* [1974] AC 133. I will not rehearse the details of such an application, as you already have a reasonably comprehensive Wikipedia article about them, available at:

https://en.wikipedia.org/wiki/Norwich_Pharmacal_order

20. I now warn you that unless you comply voluntarily with the following draft Order within seven days of today (that is to say, close of business GMT 23 February 2022), then I will apply for an Order in the form set out in the annex to this letter.
21. It is important that you act quickly, because for the torts of defamation and malicious falsehood that will be pursued the limitation period is one year. Hence every day lost endangers a claim being out of time. It is on that basis that, should you not voluntarily comply with the terms of the draft Order attached hereto, I will seek an Order with the utmost expedition.
22. I am serving this letter on the Court simultaneously with sending a copy to you. If you wish to make any representations to the Court in advance of the seven day deadline with which I am providing you, please do so by email to info@ipt-uk.com, with a copy to me at parish.matthew@gmail.com in the interests of due process. Should you fail to make any such representations, I will invite the Court to make an order in the terms framed in the Annex to this letter without further reference to you. Alternatively you may write to Lord Justice Rabinder Singh (President of the Investigatory Powers Tribunal) at the Court of Appeal, on The Strand, London, with copy by email to me. Your English solicitors will be able to advise you further on the procedure; but in all instances a copy to me of your correspondence with the Court is essential to preserve due process.
23. You have seven days from today either to comply voluntarily with the proposed Order; or to explain to the Court and to me why such an Order should not be granted.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'M Parish', with a stylized flourish at the end.

Matthew Parish

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

BEFORE THE INVESTIGATORY POWERS TRIBUNAL

BETWEEN:

MATTHEW THOMAS PARISH

Claimant

- and -

THE WIKIMEDIA FOUNDATION (1)

THE DIRECTORS OFFICERS AND BOARD MEMBERS OF THE WIKIMEDIA FOUNDATION (2)

“CORDLESS LARRY” (A PSEUDONYM) (3)

PERSONS AND/OR ENTITIES UNKNOWN (4)

GOVERNMENT COMMUNICATIONS HEADQUARTERS (5)

Defendants

PENAL NOTICE

You must obey the directions contained in this Order.

If you do not, you will be guilty of contempt of Court, and you and/or your officers may be sent to prison and/or your assets may be sequestered and/or you and/or your officers may be fined.

IT IS HEREBY ORDERED THAT:

Within seven day of this Order being served on the Wikimedia Foundation by email at legal@wikimedia.org (as to which see below), the First and Second Defendants as herein above described disclose all of the following information in their possession custody or control about (1) the Wikipedia administrator operating under the pseudonym “Cordless Larry”; and (2) any other Wikipedia administrators or editors who in the last twelve months (that being the prescription period for a defamation action in English law), who have contributed to or made defamatory remarks on any Wikipedia page about the Claimant:

1. Their full name
2. Their physical address for service
3. Their email addresses
4. The IP addresses from which they have made any edits whatsoever over the last twelve months
5. Their telephone numbers

6. Any contact or other details whatsoever that might assist the Claimant in identifying them and issuing initiating process against them for defamation and/or malicious falsehood before the Courts of England and Wales

7. The most precise particulars of the defamation of the Claimant that it is within the First and Second Defendants' capacity to provide, together with the date of the defamatory material being added by each such person and the precise contents of each such act of defamation.

The Court dispenses with personal service and permits service of this Order by email to legal@wikimedia.org

An application to set aside or appeal this Order does not amount to a stay of this Order unless the Court expressly so orders.