

IN THE MATTER OF THE CHILDREN ACT 1989
IN THE HIGH COURT OF THE FAMILY DIVISION
CASE NO: FD10C00195

AND IN THE MATTER IN RESPECT OF:

BETWEEN:

THE MAYOR AND BURGESSES OF
THE LONDON BOROUGH OF HARINGEY

Applicant

GLORIA MUSA CHIWAR
(Mother)

1st Respondent

- and -

CHIWAR MUSA

2nd Respondent

- and -

QUEEN ELIZABETH MUSA.

3rd Respondent

STATEMENT PREPARED
As Directed by LJ COLERIDGE 17th August 2011

Introduction

1. The matter of representation for the Musas

1.1 I have been asked to prepare this statement on behalf of the Musas. LJ Coleridge directed on the 17th August that the Musas submit a statement and specifically their version of events during a hospital visit on 28th June 2011. His Lordship kindly allowed me to McKenzie Mrs Musa at that hearing, and Paul to McKenzie Mr Musa.

1.2 I am not familiar with the case and hoped to rely on documentation already prepared during its history.

1.3 The Musas claim they have approached several solicitors – now in double figures - for assistance with this case. The services they have received or been offered from a number of solicitors include:

- a solicitor falsely claiming in a statement prepared on behalf of the Musas that they admit to the allegations by LBH.
- A solicitor advising allow LBH to build their case as you know you are not who they say you are.
- Solicitor privately paid saw how greatly abused by LBH to the Musas family yet after briefing on phone by Jonqui Houghton changed her mind to represent the intrest of the family rather the intrest of LBH.
 - instructing/advising the Musas to accept the allegations as true
 - a solicitor apparently confessing to being scared of LBH
 - All parties involved in the musa case has assumed the position of LBH to make sure the family is destroyed and not working towards unification of the family.
 - a solicitor, upon being dismissed by the Musas, refusing to release their case files for several months until threatened with legal action and reporting to the SRA
 - a solicitor, upon being dismissed, refusing to release the legal aid certificate
 - a solicitor who, upon being dismissed, persuaded the Legal Services Commission to revoke the Musas' legal aid certificate. LJ Coleridge stated on the 17th August that he had not the authority to restart it.
 - a firm of solicitors sought to obtain a certificate but were refused by the legal Services Commission.

1.4 The Musas claim they cannot find a solicitor who is willing to act as an advocate in the manner that one would reasonably expect. The consequence is that a handful of unqualified advocates such as McKenzie friends have attempted to fill the void. Lack of

ability to commit to what has become a long term and complicated case has resulted in inconsistencies which cannot have helped the Musas.

1.5 The Musas claim that none of the LBH allegations against them are true to any degree and refuse to collaborate in any process or work with any representative or advocate who advises them to submit to the allegations. They are both Christian Ministers in a mainstream denomination. Both are highly educated, intelligent and articulate parents from Nigeria who, in common with many capable native people, are culturally at odds with the family legal system that opposes them. They have both been under the most intense daily pressures for the past 18 months and find the situation they are in impossible to cope with.

1.6 Having interviewed the Musas and Mr Randall-Joliffe, he and I would like to propose three simple courses of action which the court could take to ensure best evidence and an economical resolution to this case:

1.6.1 This case revolves around the actions and reportings by two people:

- Aleksander Constaninou

an assistant social worker from LBH, unregistered with the General Social Care Council

- Indira Cataloz

An employee of a charity named Caris
(Christian Action in Response to Society)
www.carisharringeey.wordpress.com

We suggest the court orders that both persons above are interviewed by the Police to ascertain the source of the numerous and serious allegations they have made against the Musas. The evidence they have both submitted in reports has yet to be properly tested. A list of the allegations which the Musas could remember and their responses is in Section 5.

1.6.2. The Musas have acted on the necessity to record meetings and events using a Dictaphone. Two key events recorded with the device are a meeting with one of the solicitors who advised the Musas to acquiesce to the allegations and the incident at St. Thomas's Hospital on 28th June 2011. The version of events outlined in Dr Mcdonal's letter to LBH on 29th June 2011 starkly contrasts to that given by the Musas on 31 August 2011. The device is currently held as evidence after the arrest of the Musas by the Metropolitan Police on the 28th June 2011.

AS:

- a. the court has strongly urged the Musas many times to obtain a solicitor and criticised them for their apparent inability to collaborate with those they have approached and,
- b. the court has specifically requested the Musas' version of events on 28th June

we request that the court dispatch without warning an official to (we believe Hornsey Police station) to corroborate the existence of the device and either collect it or copy the files contained upon it or enable/assist a disclosure process so that the Musas or an advocate can use these files in their defence. Mr Musa describes the device as an Olympus Dictaphone which easily plugs and plays with any Windows computer. Specialist vendor software is not required. In addition is a mobile phone device which is also claimed to contain files which may assist the Musas' case. The required software for the mobile phone could be downloaded prior to attending the Police station.

The court should be aware that the both staff at the hospital and Police were aware of the use of the device before the arrest of the Musas on 28th June 2011 and apparently made several comments indicating their unease at being recorded.

We suggest the court not overlook the opportunity to listen to a live recording of a contested incident of such key importance to the case but feel that disclosure must happen without warning.

- 1.6.3 The Official Solicitor be appointed to oversee the case on behalf of the Musas. We believe the Musas meet the requirements of being disadvantaged, vulnerable, qualifying as minorities and cannot reasonably be expected to be able to represent themselves under such trying and alien circumstances. There is a need for a last resort litigation friend. The independence of the Official Solicitors office and the authority to undertake enquiries on behalf of the court may be useful. The court is no doubt aware of the need for equality of arms which cannot be said to have occurred thus far in this case. The vision of the Official Solicitor's office is cut and pasted from the bottom of the OSPT website below:

Our vision (<http://www.justice.gov.uk/about/ospt.htm> 31August 2011)

“Our vision is that OSPT will be a modern, dynamic organisation delivering high quality and efficient client-focused services for **vulnerable** persons, where those services need to be provided by the public sector.

We are here to **achieve justice** for those who need our services, to protect the legal, welfare and financial interests of our clients through specialist services designed to meet

their needs, and to deliver those services efficiently and effectively to provide **value for money** to our clients and the taxpayer.”

2. The Musas’ version of events at St.Thomas’ Hospital, 28th June 2011.

- 2.1 The Musas Health Visitor, Joan McLeish, Saw the Musas on June 14th 2011. She led the Musas to believe that they were required to have their baby inoculated at an appointment pre-arranged without the Musas’ knowledge. The Musas do not know what the inoculation was for, what was injected or who administered the treatment. It is apparently not unusual for children to be affected after inoculations, with raised temperature as one of the more common symptoms. MMR and MMRV are especially associated with one in five showing fever symptoms and seizures occurring up to 7-12 days after the shot. (source US Centre for Disease Control website cdc.gov/vaccines/vac-gen/side-effects.htm; accessed 1st September 2011).
- 2.2 The Musas were in Central London with their baby daughter for an appointment for legal advice with a retired barrister. They diverted to the hospital en route when their baby developed a temperature and arrived at St Thomas’s at 0850hrs.
- 2.3 The baby was sleeping as it was her normal sleeping time. She was breathing normally while waiting at the hospital reception.
- 2.4 The reception nurse carried out the routine checks such as weight and appeared to notice data on her system which prompted her to ask the Musas if they were involved with the social services. The Musas confirmed that they were. The initial patient checks were fine other than a question over a birthmark on the baby which the nurse was apparently unfamiliar with and needed to conform was not an injury. The type of birthmark is common amongst West Africans.
- 2.5 The baby was crying for some of the time that the nurse performed the initial admission routine.
- 2.6 LBH child protection services were telephoned. Peter Lee (referred to as Peter Hall in Dr Mcdonal’s letter of the 29th June) informed the hospital staff that the Musas had a history of hard drug use. Two doctors, Dr Mcdonald and Dr Mohammed, questioned the Musas on drug abuse, which they vehemently denied.
- 2.7 At some stage Mr. Musa left the hospital to obtain batteries for the Dictaphone and a camera to record events, as he was aware of the limited recording capacity of the mobile phone device. Meanwhile the situation was recorded on

the phone by Mrs. Musa. Mr. Musa denies being gone for the two hours business meeting that is claimed by LBH.

- 2.8 Peter Lee phoned the Police and apparently reported that the Musas were at the hospital and had admitted the baby poisoned with opiates. No test had at this time yet been done by the hospital.
- 2.9 A test was done on the baby's and produced a negative result. A separate test was inconclusive for opiates. This information is apparently corroborated by another letter which is not presently available. In addition, the letter states that the dip test is to test for blood in urine and is not designed for use except for urine. Anytestkits.com shows that bacteria, such as what could be expected from a stomach sample, can indicate a false positive for blood.
- 2.10 Dr Mohammed inserted a drip into the baby which Dr McDonald used to administer an antidote to opiates. It is unclear whether the two doctors separated then worked together again but at some stage Dr Mohammed became very concerned about the level of antidote being administered. The Musas claim Dr McDonald administered many doses to the child and did not appear to be recording the dosages. Dr Mohammed said "that is too much for a child that age" and asked Dr McDonald if she "would like him to show her how to do it"; which prompted Dr McDonald to tell him to go away. A third consultant, a Dr Paul, said that it was "too soon to conclude" about the presence or otherwise of opiates. Dr McDonald continued with the injections.
- 2.11 At some stage during the process the staff caught sight of Mr. Musa's recording device. The baby was immediately moved upstairs to a ward and the Musas were refused access to their child. They repeatedly asked the receptionist if they could see their child and were told that it seemed very strange for them not to be able to see their child.
- 2.12 The Musas were then allowed into the ward where the baby was again restless and crying. Mrs. Musa was allowed to hold and comfort her child. Injections continued.
- 2.13 The Police attended and told the Musas to remain in the hospital. They were arrested, handcuffed, cautioned for child cruelty and taken to Hornsey Police station, at around 5pm. They claim they were racially abused by one officer who referred to Mrs. Musa as a 'bloody black criminal.' They were told they 'were going to prison, you're not coming out'. The use of the recording device apparently earned them more derogatory remarks and information given to the police by Haringey social service. The Musas were processed and left in their separate cells without blankets, food and water or access to washing facilities until around 1pm the following day the 29th June. They saw the Solicitor at around 3pm on the 29th June. It is unclear as to whether the Police

have followed the usual bagging procedure in front of arrestees when removing the personal items from the Musas.

- 2.14 Whilst in custody, a Police doctor took samples of urine, blood and hair for drug testing. The urine test immediately produced a negative result; at which time the police apparently apologized. The blood and hair test results are still awaited. The court is invited to consider why these results are either not yet available or are not yet reported by LBH.
- 2.15 Both Mr. and Mrs. Musa obtained private drug tests, specifically for opiates, immediately upon their release. The results were obtained within days. Both tested negative for any drugs.
- 2.16 The Police used the Musa's house keys which were removed as part of the arrest procedure to enter their home without the knowledge of the Musas whilst they were still in custody. A thorough search did not find drugs, or drug use equipment or any other evidence of drug use.
- 2.17 Mrs. Musa has been labeled as uncaring for laughing whilst she was in the hospital. The laughter was of an incredulous type; she was talking to her mother in Nigeria on her mobile to calm her nerves after LBH were telephoned. She was also astounded to witness racist comments from hospital staff relating to a Somali woman who could not speak English. Mrs. Musa, an extremely experienced mother and carer, perceived the problem with her baby as one only of a temperature which would pass with adequate attention and, in common with any good parent, she had taken the appropriate action. Whilst scared of LBH, she had no reason to doubt the efficiency of the hospital. Cultural differences and methods of dealing with stress differ according to culture and Mrs. Musa's mother was doing her best to cheer up her daughter.
- 2.18 A family friend, Vicky, was present throughout during the events at the hospital. She is, however, extremely scared to act as witness as she fears this case is now one where the Establishment has vested interests in finding against the Musas and believes that to act as witness may prejudice her visa. This fear comes consequent to the disappearance of 'Frank', the Ghanaian personal assistant for the Musas. Frank had close personal knowledge of the Musa family which they feel countered LBH's version of them. He disappeared. The Musas learnt he had been arrested and detained in an immigration detention centre. They raised the money for a solicitor to help but he took four months to deal with the matter and have Frank released. Vicky's fears, and the fears of the Musas, for anybody who assists with their case, appear to them to be validated by the behaviours of the LBH social workers, who the Musas believe:

- a. to have intimidated witnesses, (the social worker Joyce Agyekem)
- b. to have disclosed information relating to the case and disseminated false propaganda, spreading LBH's version of the Musas amongst church members to destroy their previously fine reputation (Joyce Agyekem)
- c. to have manufactured an atmosphere of fear in Harringey over and above what can expected of an adversarial and non-inquisitorial family law process
- d. to have attempted to coach Abraham, the Musas' son, to say he did not want to return to his family, which he told his mother he refused to do. The exchange between mother and son was recorded by the mother in a contact centre.
- e. to have instructed a contact center manager to bully Mrs. Musa, which she had refused to do, and instead disclosed this information to Mrs. Musa, revealing Joyce Agyekem as the social worker. Upon realizing she was being recorded, the manager then became aggressive and said she *would* from then on be giving Mrs. Musa a hard time. Relations deteriorated to the point that Mrs. Musa was eventually too scared to attend the contact center.
- f. to have lied in the Finding of Fact hearing in front of Judge Brass regarding the events of the 22nd December 2010, when Joyce Agyekem said that no meeting ever taken place on that day. Therefore the related issues raised with her in court were sidelined. This misinformation caused the hearing to take a sharp turn. Mr. Randall-Joliffe informed HHJ Brass of Ms Agyekem's conduct, but this resulted in his being evicted from the courtroom. Joyce Agyekem used Mr. Randall-Joliffe's absence to further misinform the court. The Musas therefore lost all confidence in the court process at this hearing on the second of the 5-day fact finding process. It is reflected in HHJ Brass's Approved Judgment how well the Musas were handling matters, with the assistance of their McKenzie friends, up until that time. The Musas have since had extreme difficulty in fully engaging in their own case under circumstances where all trust between them and their improperly registered and apparently unaccountable appointed social worker, and the courts, has broken down.
- g. to have intimidated Kay Young, who has trained in social work and criminal law, and who was assisting the Musas. She was known to LBH by virtue of her being present at the meeting of the 22nd December. She was visited at her home in Hatfield, Hertfordshire, by two people claiming to be from children's services in her area. She refused to see them until they could verify their identity and checked their names with the GSCC register. One was not registered at all; the other was registered, but in Harringey rather than Hertfordshire. Joyce Agyekem was also checked and found as being registered in Hertfordshire. The inconsistencies of social workers acting out of their registered areas were frightening. These issues

were raised both in court and with the GSCC, but on both occasions no actions or questions happened. Mrs. Young refused to engage with improperly registered social workers on a new matter involving her own son and her matter was escalated within her own social service department. The perception is that her link to the Musas triggered the initial visits to Ms Young. Mrs. Young moved to Ireland with her son, where Irish social services, prompted by Hertfordshire social services, conducted an assessment of Mrs. Young and took no further action. She remains in Ireland, in fear of returning to the UK.

- h. to have persistently encouraged the Musas to apply for residence status and even for British passports. They believe this would facilitate swifter and permanent removal of their children by negating the status of the whole family as foreign national visitors and undermine their protection under International law. They report that HHJ Brass also encouraged LBH to urge the Musas to make the relevant applications at a hearing in December 2010. The Musas do not meet any eligibility criteria for British passports, they were able to pay their way and so were not restricted from staying in the UK, and had no intention of remaining once their religious mission was fulfilled.
- i. to have been instrumental in the disappearance of a key witness, namely Ms Karen Rimmer; the resignation of an LBH social work manager who was apparently outraged at the treatment meted out to the Musa family. The Musas also state that they were informed by this manager of an internal meeting at LBH where it was admitted there was no case against them but the policy would be to continue so as to save face.

2.19 Mrs. Musa also claims to have been contacted, by a person who she believes to be working for LBH. The calls have been frequent and informed what LBH social workers were about to do. The caller warned that drugs would be planted and recently that there plans to kill them.

3. The Housing Anomaly

- 3.1 The Musas have lived in the country . They were entirely self supporting, living off earnings from sales of their own merchandise in Africa and the US, Mrs. Musa is also a qualified accountant and banker. For some time before 2009 they were living in Manchester but moved to London upon suffering racial harassment. They were renting a four bed roomed house in Barnet. Mr. Musa had already set up business as a film maker in a studio in Haringey, focusing on setting up a TV station covering faith and politics. They were very well connected and the family well known amongst the religious and political classes of North London. A friend in the church advised the Musas to apply for social housing. In October 2009 Mrs. Musa did so, whilst pregnant, for no reason other than to reduce the family outgoings.
- 3.2 Mrs. Musa presented conferences at prestigious places such as the Hilton Hotel in London on family life, raising children, breastfeeding and nurturing children, and parenting courses, sometimes attended by as many as 500 people. She has educated thousands of people in Africa over the last 20 years. Such educations are normal within the church in any country. In 2009 the Musas could be classed as a wealthy couple. It is, however, usual practice for missionaries to seek to reduce their outgoings whilst establishing themselves in a new area.
- 3.3 The housing application was followed up by visiting LBH's Housing Office some weeks later. A staff recommended they speak to CARIS. Firstly, the Musas sought the advice , Claire Cober, the leader of LBH, who said she would assist. The Musas then saw CARIS in St. Anne's church, Tottenham. They met with Indira Katallozi, an employee of the caris, in December 2009. She invited the Musas to the 2009 CARIS Christmas party on the 25th December. Michelle Collins, an actor, met the Musas and immediately befriended their children. On the 28th, Ms Collins invited Mrs. Musa and the children to a theatre in Croydon where they were lucky enough to go backstage after the show. On the 30th Mrs. Collins arrived at the Musas' to take the children s. and refused to take Mrs Musa due to no place in the car as it was too full. After the outing Ms Collins took the children to her home and introduced them to 'their rooms.' No arrangement had been made for the children to stay overnight. By 9pm Mrs. Musa was frantic and rang everybody she knew to locate the children. Upon reaching Mrs. Collins on the phone she could hear her son crying in the background. Mrs. Musa collected the children.
- 3.4 On the 4th January 2010 Indira asked if Ms. Collins had offered to give the Musas TVs and computers. The Musas were not poor, nor did they lack the items offered, so they were politely refused. Mrs. Musa felt her family were being imposed upon and declined the requests to look after her children. On

5th January they received the key for their new accommodation with Christopher House London Ltd, trading as Limelight Properties.

- 3.5 CARIS assist in the sourcing of housing for people assessed by their 'no recourse to public funds' team as needy or have temporary financial difficulties. The Musas did not meet the criteria of needy people so the team presented Mrs. Musa as a lone mother with five children. This apparently happened without the knowledge of the Musas. CARIS and Alexandra have subsequently fabricated reports to LBH that the Mrs. Musa 'ticked all the boxes' to be a sex worker before she was presented with keys to the new home. It could not conceivably have been overlooked that the Musas were a full family unit.
- 3.6 No contract was signed and the type of accommodation the Musas were in was not explained to them. They were told not to worry when they enquired as to the payment of rent and existence of contract. Not until the recent eviction process did not follow the usual patterns did Mr. Randall-Joliffe speak to Caroline, the legal representative at Limelight, who informed him that the accommodation is 'bed and breakfast.' No breakfast was ever served. The accommodation is self contained.
- 3.7 During their stay, the Musas were perturbed by visitors coming and going at their home, without their prior arrangement and consent. These were apparently builders who did not seem to repair anything, or explain their presence. Complaints were ignored. Favour, the nine year old daughter, was disturbed enough to urge her mother to leave the accommodation.
- 3.8 At sometime before April 2010 LBH told the Musas they did not meet the eligibility criteria for the accommodation and were told to leave. LBH offered the Musas free assistance to relocate to Africa, which was refused as Mrs Musa was by then heavily pregnant. The functioning and motives of the 'no access to public funding team,' which apparently includes Alexander Constatinou, and the manner in which accommodation is awarded, and why, could be worthy of closer attention.
- 3.9 On the 8th April 2010 the Police forced entry into the property whilst the family was watching TV. The Police did not seem to be clear as to why they are there. They left but remained in the locality and entered the accommodation twice in 30 minutes. On the second visit the Police commented about a letter of complaint to Haringey children service about Alexandra constantino on the Musas' table. They went out and came back and removed the children without explanation.
- 3.10 After ringing 999 three times they were instructed not to enquire via that number again. The Commander of Tottenham Police, who was a friend of

Naval Weston , was unable to assist in locating the children or informing the Musas as to what was going on.

4. The letter allegedly found in the garden

4.1 A resident in the downstairs flat, a Ms Karen Rimmer, reported having found a letter in the garden of the house. The letter has subsequently been considered to have written by Favour, the nine year old daughter of the family. The letter is presumed by the Musas to have been found in the front garden as the children had no access to the rear garden.

4.2 The parents report that they have seen a document stating that a letter was found on the 9th April. This would be one day *after* the Police took the children - on the grounds of having found the letter.

4.3 The freehand letter and its contents are well known to the court. The court has also seen the page of Favour's careful and neat handwriting from her school book of the same period. Any claim that the two samples are similar in cursive style is unreasonable. The note, though scrappily presented has, when viewed closely, joined up words written with a degree of fluidity further contradicting the untested presumption it was written by a child. The appearance and method of writing particular letters, notably letters s, k, f, differ significantly and Favour does not join at least her p's, or b's It remains to be explained how six children of a family can be removed and eighteen months of severe public expense incurred yet the core evidence relied upon is apparently untested, and a reluctance to test appears to prevail, by the Police investigation, the Local Authority and the Court.

4.4 The Musas were not informed of the existence or content of the letter until two weeks after the children were taken into care.

4.5 Is favour Dead or alive

4.6 As mentioned in the last bullet point in 2.16, Karen Rimmer has disappeared. The Police have been unable to trace her. She was apparently re-housed by LBH and failed to appear before HHJ Brass despite the learned judge's issue of her summons to court.

4.7 Mrs. Musa has, however, more recently spoken with Karen Rimmer's sister, suggesting that Karen could be found, and that there may not be sound explanation for her non-appearance in court.

5. The earlier allegations against the Musas.

- 5.1 All the allegations against the Musas apparently stem from Indira Katallozi. Alexander Constantinou seems to be the medium between Indira and LBH.
 - 5.2 Mrs. Musa reports that she has been misquoted by Ms Constantinou in documents and when providing verbal evidence to the court.
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5.3 The allegations by Alexander Constantinou and the responses from the Musas are listed below:

- 5.3.1 - that the children did not belong to the Musas; that the children were being trafficked.
- 5.3.2 Cell mark Ltd were instructed by LBH to perform DNA tests which conformed all Six children were the offspring of Chiwar and Gloria Musa.

- 5.4.1 - that the Musas had a 'child missing.'
- 5.4.2 This stems from a misunderstanding that the Musas had a child called Peace. The fictitious Peace had a birthday of February 1st 2001 - which would have meant Peace and Favour's gestation periods would have overlapped in the womb - with their being born 5 months apart.

- 5.5.1 Haringey Fabricated that Mrs. Musa had been raped by her stepfather in Sheffield when she was fifteen and that he administered her opium. Alexander Constantinou also claims that Mrs. Musa has no living biological parents.
- 5.5.2 Mrs. Musa lived in Nigeria at that time, with both of her biological parents, who are still alive today. LBH have personally consulted with Mrs. Musa's parents when LBH refused them access to their family Members upon their visit to the UK Last year. Mrs. Musa has never been raped. Mrs. Musa knows nobody in

Sheffield has never been there and has no intention of so doing. She has only ever slept with her husband.

5.6 Haringey fabricated that Mrs. Musa was a trafficked sex worker ‘performing special services to members of the church.’ A Mr. Patel is alleged to be one of Mrs. Musas regular clients. He was claimed to have produced a witness statement and it is believed by Mr. PRJ that Patel was summonsed to give evidence.

5.6.1 No statement was produced and Mr. Patel did not materialize.

5.7 – Haringey fabricated that Mrs. Musa informed that she had had brain surgery for epilepsy.

5.7.1 Mrs. Musa has never had brain surgery and does not suffer from epilepsy. She bears no relevant scars.

5.8 – Haringey Fabricated that both Mrs. Musa and the children have been trafficked by Mr. Musa for sexual exploitation

5.8.1 DNA tests proves the Musa’s paternity and the children were bright, articulate and, by all accounts other than those attached to LBH, well cared for - until their removal by LBH.

5.9 –Alexandra Fabricated that Mrs. Musa carries Sexually Transmitted Diseases, specifically syphilis and HIV.

5.9.1 No proof has been forthcoming; no indication has been given as how Alexander Constantinou diagnosed the illnesses. No referrals were made by LBH for Mrs. Musa to be examined. Mrs. Musa was clear of STDs at the standard ante-natal check with her sixth child in February 2010.

5.10 - that all the children have different fathers.

5.10.1 DNA proves Mr. Musa’s paternity of all five children born at that time.

5.11 - that the Musas were 'destitute and homeless.'

5.11.1 Please refer to 3.1 and 3.2 above. The Musas were fine , No concerns from any doctors GP, or Schools until their livelihoods were shattered by the attrition of the last 18 months. They could previously afford their rent but have apparently made the mistake of seeking council Housing and thereby placed themselves within reach of LBH.

5.12 - that the children are not fed.

5.12.1 Photos of the children reveal them to be fit and thriving. They are above average at school. No indication is given as to what degree the children may be deprived, nor is there any reference to LBH referring the children further or taking corrective measures. The Musas and their children were highly social people renown for their work in teaching parents how to care for children. It is unlikely that any abuse would have gone un-noticed in the circles the family intensely engaged in.

5.13.1 - that Favour is sometimes locked in the garden at night wearing only her nightie.

5.13.2 The family had no access the back garden and the people traffic by the front garden would have raised alarm bells very quickly. The Musas deny they have abused their children in such a manner at any previous address.

5.14.1 - that Mrs Musa presented a baby to a Northern hospital covered in faeces.

5.14.2 no report exists,no photographs was produced, no explanation as to why the baby was not then brought to the attention of the local social services. The location of the hospital is unknown.

5.15.1 - that Mr. Musa was inappropriately touching female staff at the children's St Patrick's School in Manchester.

5.15.2 No reports corroborate the allegations. Mr. Musa denies them.

5.16.1 -Haringey fabricated that Mrs Musa was the subject of domestic violence from Mr. Musa.

5.16.1 Mrs Musa denies she has ever been mistreated by Mr. Musa it was the police and social service that abused Mrs Musa

5.17.1 - Haringey Fabricated that Mr. Musa stole church equipment in Haringey

5.17.2 Mr. Musa says its Highly slanderous.

5.18.1 - that the Musas 'moved twice from their accommodation' 186 west green Road (the insinuation being that their moving around was unstable for the children or that they were avoiding proceedings).

5.18.2 the Musas remained in one home, as is evidenced by their receipt of all court and care-related material and their full engagement in process. No evidence is forthcoming that the Musas were not available to the social services at any time.

5.19.1 - that Mrs Musa has mental health problems.

5.19.2 Mrs Musa has no history of mental health problems. Alexander Constantinou provided a doctor with this information which shocked the good Dr upon his meeting with Mrs Musa. The doctor had also been told the same allegations of syphilis, HIV and that Mrs Musa was a sex worker.

5.20.1 - that Mrs Musa's baby in the womb had Down Syndrome.

5.20.2 This transpires to be false.

5.21.1 - that the Musas were 'not cooperating'.

5.21.2 LBH appear to be troubled by the Musas not collaborating with their version of events to the extent that not submitting to the pressure applied to them has been interpreted as further proof of abuse.

5.22.1 - that Mrs Musa beats her children with a broomstick.

5.22.2 The Musas have never use broom They use hover.

5.23.1 - that the Musas beat their children with cable.

5.23.2 No relevant photographs to back up such serious claims as would be expected.

5.24.1 - that the Musas smack their children

5.24.2 This is apparently partially corroborated by the children themselves. However, it could be noted that the most serious allegations come from the two children who shared the same care location for some time. They are been coached,brainwashed by the careers and social workers as the children has never complained when living with their parents.

5.25.1 - that the Musas tie their children's ankles to dangle them over balconies.

5.25.2 The Musas had no balcony at the Limelight property nor at their house in Barnet. The allegation is denied.

6. Additional

6.1 The Musas have referred to a midwife they knew from Barnet who has volunteered to assist them. She has apparently been 'warned off' by Alexander Constantinou. A search of documentation reveals her first name to be Angela.

6.2 A mobile phone text from the Independent Social Worker, Suzanne Moore, independent Social Worker, to Mrs Musa on 28.12.2010 reads:

“we think there are many aspects to your parenting which are good. Your children are lovely, bright and intelligent. This has to be a credit to you both. The problem we are struggling with is the stance you have about everything being fabricated including evidence that has been presented to the court and your concerns about a grand design conspiracy. We think that a bridge needs to be crossed here. This is what we want and need to seriously get with on when we meet next. Keep well in the meantime. Send our regards to Mr. Musa. Suzanne. “

- 6.2.1 (The only problem LBH appear to have is the stance of the Musas). Nine months later this
- 6.3 Mrs Moore advises the court in Para 162 of HHJ Brass’s Judgment of February 28th 2011 that “it is not too late. If the parents can begin to acknowledge that their parenting of the children could have been better, there is room for improvement.” This is in variance to the text of 6.2 above.
- 6.4 6.2 and 6.3 are indicative of an authority which has made a mistake and are seeking a way out but need some shift in the Musas’ position to grease some progress in a manner that may save faces and positions. Such behaviour has become a cultural norm in authorities and politics and need not surprise. This case has been layered with distraction to the extent that there is presumption against the Musas without cogent expert opinion or proof yet being available.
- 6.5 The Musas claim that the ISW has withheld that the children have said to her that all of the children wish to come home. This has been omitted from the ISWs report and not reported to the court.
- 6.6 The Musas have evidence that LBH have issued invalid travel tickets for contact to the children in care in Kent. This has been corroborated by the station manager of Seven Sisters Tube who stated to the social worker Joyce Agyekem, Mr. PRJ and Kay Young that only 2 in 20 tickets were valid for through travel to Kent. The local authority has a statutory duty to pay for all of the travel. The Musas have almost been arrested whilst traveling with the issued tickets.
- 6.5 The Musas have not seen three of their elder for four months, one for seven months and the eldest has not been seen since she reported to her mother at a contact session that she was molested whilst in care, over twelve months ago.
- 6.6 Mrs Musa has reported that Indira katolozzi told her that the Musa children, by virtue of being articulate and well balanced, would be easy to earn money with. The expression was not further qualified.

- 6.7 Mr Musa claims he was initially absent from the proceedings insofar as his name was never included on documentation. However, as the allegations related mainly to the mother he applied to be the care of his children. After he became involved in proceedings allegations began to mount up against him. Research shows that social services are generally very reluctant to involve fathers (*Manufacturing ghost fathers: the paradox of father presence and absence in child welfare, Leslie Brown et al, 2008*). NAPO policy documents from 2008 indicate the union's guidance for social workers to be strongly anti-father.
- 6.8 The Musas have now been evicted from their accommodation by London Borough Haringey. It appears they were contained during the period that they still had custody of at least one of their children. They were told in March 2010 that they did not qualify for the accommodation and would have to move. The Musas refused an incentive for their relocation costs to Nigeria to be paid. The eviction last week after an application for a long term injunction was refused in the County Court prejudices LBH's duty to reunite the family if possible.
- 6.9 The Musas are resistant to LBH knowing many of the details in this document. They fear consequences from LBH and the court for themselves and those assisting them. They may yet amend this document before submission.
7. This case appears to hinge on the results of two forensic tests below and an assessment of Queen Elizabeth by a paediatrician;
- the comparative forensic authorship analysis between handwriting on a note allegedly found near the Musa's accommodation and that of Favour's handwriting sample from her school book.
 - the toxicology test for opiates in Queen Elizabeth, the Musas baby, from a sample of her body fluid taken at St. Thomas's Hospital on 28th June 2011. The sample has been removed by the Police pursuant to court order and the results of tests in Europe are awaited. The sample is to be tested to prove it originates from the said child. A hair strand drug test from Queen Elizabeth is also awaited.
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- With all Events for 16 months Haringey and their professional should Never Be trusted Because they have fabricated almost all document to enable them keep our children in long time care or adoption.

We want this court to Free our children from the detention of Haringey to the loving arms to their parents and family.

The plot to remove our little baby began since November 2010 several attempts has being has being made by Joyce. Ageyekum,,her Manager and Rosita. Moise .Evidence back up.

We Reserve The Right for this document to be updated if necessary.

Prepared by
S G/PRJ
Mistake For the Musas
1st September 2011