

WITNESS STATEMENT

(CJ Act 1967, s.9 MC Act 1980, ss.5A(3)(a) and 5B;

Criminal Procedure Rules 2010, Rule 27)

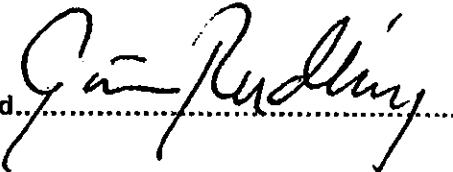
STATEMENT OF GÖRAN RUDLING

Aged: Over 18

Occupation: Law reform activist

This statement (consisting of 9 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true

Signed.....

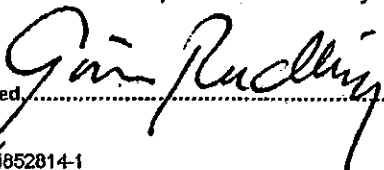


Dated Enskede Gård, 31 January 2011

I, Göran Rudling, of Planterarvägen 27, 120 48 Enskede Gård, Sweden, make this statement and say as follows:

1. I am 59 years old and I am active in promoting law reform in relation to sexual offences. I am a retired businessman and sales consultant of good character. I am experienced in internet and social media use. My particular interest in sexual offence law and the effective prosecution of rapists has come about because my mother was the victim of rape and sexual abuse by her step father and this has affected me and my family's life. It has caused me to take a particular interest in the administration and reform of rape laws in Sweden because I am of the opinion that present sex laws do not offer sufficient protection for victims. I write articles on my blog, www.samtvcke.r.., and I speak and write both Swedish and English. I should perhaps preface my comments by saying that I am fully aware that my statement could be seen by some as counter-productive for my campaign of reforming sex laws in Sweden since this case

Signed.....



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involves an allegation of a sex crime. But I am extremely concerned at any false allegations made by a person relating to sexual misconduct because it devalues reports made by genuine complaints and forces police to devote time and resources that could be used to catch real offenders.

2. My interest in sexual offence law and reform to ensure better protection under the law for victims led me to follow the Assange case. I should add that I am by no means a supporter of WikiLeaks or Julian Assange (I am critical of their work) and I have no connection with or liking of Mr Assange. My only concern has been to ensure that this investigation is effective, the real offender is punished and to avoid a possible miscarriage of justice.
3. For the above reasons, I made certain investigations about these complaints and have discovered evidence that might seriously undermine them. I have contacted the police and have been interviewed by them.
4. I thought it was important that the police should get the information that I had discovered which showed that Ms Ardin, one of the complainants, had deleted certain Tweets from her account which would have been important in the investigation. The deleted Tweets demonstrated that Ms Ardin had, the day after she had the sexual relations with Mr Assange of which she complains, communicated with others in a way which shows that she was friendly with him and happy to be in his company. This is not consistent with her allegations. Moreover, it is apparent that she was aware later of this inconsistency and sought to destroy evidence that would be helpful to the police in the investigation, and obviously helpful also to the defence.
5. On 9 September 2010 I contacted Björn Hurtig's office and sent an e-mail with the information of deleted tweets. On 14 September I sent an e-mail to the Wikileaks' lawyers with similar information.
6. On 15 September I contacted the superior prosecutor (överåklagare), Marianne Ny, by e-mail about the destruction of this evidence. On 16 September 2010, I was interviewed over the phone by police investigator Ewa Olofsson. She took a long statement over the telephone from me and I took the time to guide her so she herself could see the deletions. I put down all the facts about the Tweet deletions and sent Ms Olofsson an e-mail (Exhibit G/R-1). I also informed her that I would send her a second

Signed.....

Gün Rudling

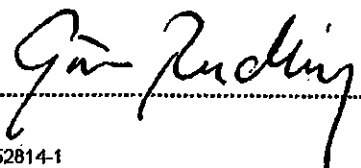
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Peter Gustavsson

e-mail with my suggestions of what I thought the police should investigate since I was of the opinion that facts indicate that Ms Ardin's accusations are made up. I sent a second e-mail to Ewa Olofsson at the police on 17 September 2010 (Exhibit G/R-2). A third e-mail, a copy of Ms Ardin's e-mail, was sent when I received an e-mail on 30 September from Ms Ardin.

7. I have not been provided with a copy of my telephone interview. In my interview with the police, I informed them of my findings that Anna Ardin had, the day after she had sexual relations with Mr Assange, communicated with others in a way which shows that she was warmly friendly with him. This is not consistent with her allegations. Moreover, it is apparent that she was aware later of this inconsistency and sought to destroy evidence that would be helpful to the full police investigation. I do not know whether my interview with the police has been provided to the defence but it contains information that is very helpful to them. I have been informed by Mr Assange's lawyers that they have not ever received copies of my evidence, so, in order to ensure that they are aware of this, I have provided the information to them but have not informed the police that I have done this.
8. Given my concern about sexual offence cases and law reform in Sweden, I took an interest in researching the Assange case. When looking at Anna Ardin's Twitter account (twitter.com/annaardin), I saw a noticeable absence of tweets from 14-19 August. Since Mr Ardin is a frequent blogger I thought it strange that there were no tweets from her around the dates of the seminar at which Mr Assange was a speaker and around the dates of the alleged sexual assault. As of January 2011, the twitter.com/annaardin account is now private, but prior to this it was accessible to the public.
9. In early September I came across a site called annaardin.bloggy.se. Bloggy is a Swedish equivalent of Twitter, which is used and recommended by the Brotherhood movement (Bröderskapsrörelsen), a political movement associated with the Social Democrat Party, the group that Ms Ardin is affiliated with. Ms Ardin's bloggy account is a "mirror" of her Twitter account. The Court may well be familiar with the fact that one can simultaneously post directly from a twitter account to e.g. Facebook and linked-in; well so it is with Twitter to bloggy.se. This means that when she posts a tweet on Twitter the same tweet appears automatically on her Bloggy account. When I

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compared her Twitter account to her Bloggy account, it was obvious that three tweets appeared on her Bloggy account that did not appear on her Twitter account: Ms Ardin had deleted these Tweets from her Twitter account around the time of the police report, 20 August.. I attach at (Exhibit G/R-3) the Swedish text of the deleted Tweets, but the following is an English translation:

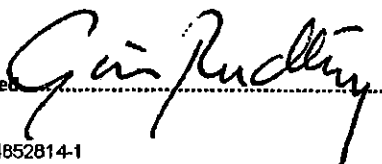
Tweet 1: 'Julian wants to go to a crayfish party, anyone have a couple of available seats tonight or tomorrow? #fb

Tweet 2: 'To sit outdoors at 02:00 and hardly freeze with the world's coolest smartest people, it's amazing! #fb

Tweet 3: @dekaminsky do you mean it is worth it having cray-fish?

10. Having discovered these tweets on Ms Ardin's Bloggy account, it was obvious that Ms Ardin had wanted to delete the tweets, but forgot that she had two separate accounts and that her Bloggy account created an automatic mirror of her Twitter account. This system means that when you enter information to Twitter, you do it once and it appears twice: on Twitter and Bloggy. But when you delete tweets, you have to delete them both from Twitter and separately from bloggy.se. Ms Ardin had clearly not realised this.
11. The three tweets above that were erased from Ms Ardin's Twitter account were therefore still in full view at anna-ardin.bloggy.se. Anyone could have made the comparison and made a comment on the fact that tweets were deleted. For some days nothing happened. It seemed like I was the only person that had discovered the deleted tweets.
12. To double check whether Anna Ardin was trying to hide her Twitter tweets, I posted a comment, using the signature Stefan and one of my hotmail addresses, on an article by Sara Gunnerud entitled "Wikileaks heroes can also do dim-witted things" from August 24. The article is published at the Rebella blog. Rebella is a Social Democrat gender activist blog run by five women, including Ms Ardin, who is one of the moderators on the site as she is listed on its front page under the heading "Författare", which means "author" and denotes the moderator and authors. Her name appears further down that front page under the heading "Rebello" which is the made up feminine plural form of

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the word "rebell", meaning rebel. In my comment I mention the deleted Twitter tweets and Anna Ardin's 7 step program for legal revenge that was posted on 19 January 2010 (which I will refer to in more detail below). My comment was posted on 8 September 2010 at 19.27, which is attached at (Exhibit G/R-4.) The comment is on the bottom of the page.

13. It is not as easy to remove things from the internet as one might hope. Google takes snapshots of how web page look - these are called caches. So if one looks at the cached page for a page and see what it looked like when Google visited the page last time. In the cached page for Annaardin.bloggy you can see what it looked like on 19 August (Exhibit G/R-5).. The tweets reveal that Anna Ardin had a high opinion of Mr Assange and that she very much enjoyed his company while he was staying at her home, and these were posted after the alleged sexual assault. It appears that Ms Ardin's complaints to the police do not include all of her real involvement with Mr Assange. She has not informed the police about all the facts about her relationship with Mr Assange. According to the police and media reports, Mr Assange is reported as having stayed at Ms Ardin's flat from 11 August until 20 August - for many days after the alleged assault.
14. On 13 September 2010, more than five days after I had posted my comment on the Rebella blog, my comment was reviewed and removed by the moderators of the site. I then posted another comment in which I mentioned that one can read the deleted tweets at annaardin.bloggy.se. Within 20 minutes my comment was removed. At approximately 23.00 on 13 September 2010 the entire bloggy.se site was taken offline for five hours and when it was reopened at approx 04.00 (I stayed up and watched) in the morning of 14 September the tweets that Anna Ardin had deleted from Twitter had also been deleted from annaardin.bloggy.se.
15. After discovering the deleted tweets I became suspicious about the allegations being made by Ms Ardin. Those tweets showed that she was pleased to be in Mr Assange's company and had clearly been spending time with him - even arranging a party for him - after the alleged assault. In December I found out that Ms Ardin was present at a meeting with between Wikileaks, Mr Assange, and Ms Troberg and Mr Falkvinge from Piratpartiet (The Pirate Party, a internet activist political party), and an IT specialist unknown to me. The meeting resulted in an agreement between Wikileaks and

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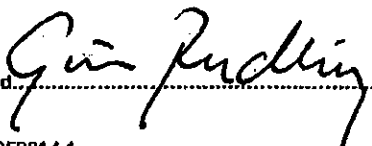
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Piratpartiet regarding servers for Wikileaks, which provided the advantage that WikiLeaks material would be protected by the Party as any subpoena would need to be made against that Party. Ms Ardin was appointed personal press liaison officer for Julian Assange at this time. In a press release dated Tuesday 17 August 2010 Ms Ardin's role is clearly visible. In the press release one can see that Ms Ardin's name is erased in one place, but the Pirate Party forgot to erase it twice. I attach a copy of that press release at (Exhibit G/R-6). To me this indicated that Ms Ardin, at this time, saw herself in a long term relationship with Julian Assange and likely Wikileaks, and had accepted a role to work closely with him while he is in Sweden - just days after she alleged he sexually assaulted her. At that time, Mr Assange was considering operating Wikileaks out of Sweden: he applied for residence and a work permit in Sweden on 18 August 2010, just days later. Therefore, Mr Assange's plan was - at that time - for a long term commitment to Sweden and Ms Ardin's commitment to become his personal press secretary was also likely to be a long term commitment.

16. On 14 September I contacted Anna Troberg of the Pirate Party to find out if she had been contacted by the police to give evidence, since she had been at a dinner with Ms Ardin and Mr Assange after the alleged assault, and could give evidence about her observations of their relationship. She had not been contacted by the police. Ms Troberg informed me that it seemed that Ms Ardin and Mr Assange were close and friendly. Before I hung up I asked her to make detailed notes on everything she remembered from the dinner just in case the police would contact her for an interview. I do not know whether she has since been interviewed by the police or not.
17. I became increasingly concerned that nothing was being done about my reports to the police and the fact that the investigation appeared to be ignoring important exculpatory evidence. At 06.19 in the morning of 30 September 2010, I posted an article on my blog with the full story about Anna Ardin and how she has erased tweets twice. The Swedish version of this blog and an English translation are attached at Exhibit G/R-7. It is a detailed description of the tweets, the fact they had been deleted first from Twitter around 20 August and then a second time from blogggy.se on 13 September 2010, after I had pointed out the exact address where the tweets could still be found. Just 25 minutes after my posting, at 06.44, I received an e-mail from Ms Ardin. I attach a copy of the emails sent between us at Exhibit G/R-8. In her e-mail she defends her decision to delete her Tweets on Twitter on or around August 20. She writes, "I erased the

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tweets to try to avoid the media attention I knew would come, it was tough enough anyway, and I haven't tried to erase the translated page of revenge. I don't even understand how that list could be connected to this."

18. It is alarming in the context of these allegations - and the deleted tweets - to have then discovered Anna Ardin's blog post from 19 January 2010 about revenge. Anna Ardin appears for a long time to have wondered how she can exact revenge on a man who dumps her or is unfaithful. I attach copies of the Ms Ardin 7-step programme for legal revenge which had appeared on her blog site (Exhibit G/R-9). It should be noted that MS Ardin recently has deleted most of the post on revenge. I attach copies of what her post looks like today (Exhibit G/R-10). This is surprising since Ms Ardin, in her e-mail to me on 30 September 2010 (set out above), told me she had no intention of deleting her 7-step programme for legal revenge and stood by it.
19. In my work on sexual offences reform, I have become familiar with police procedure and there are aspects of the investigation in this case that do not comply with what is recommended. For example, the first interviews were not videotaped or tape recorded, so there is no way of finding out what the complainants actually said, if the information was given freely or if the information was a result of questioning. It is also impossible to know what questions the police asked and what areas the police tried to investigate. To do a first interview with an alleged rape victim in this way is contrary to recommended procedure.
20. In 2005 and 2007 the National Police Board and the Swedish Prosecution Authority published their findings of thorough inspections on how different police districts conduct rape investigations. In the summaries we can read that it is very important that an interview is documented as a video recording, or at least as a tape recording. In summary, these reports state that:
 - (a) The interview with the victim is one of the focuses of the investigations of rape and often the prosecutor's main evidence in a prosecution. It is therefore of particular importance how the interview is conducted and how it is documented. In a small number of the cases examined, video recordings of interrogations occurred. Such recordings should be held to a greater extent (2005 Report);

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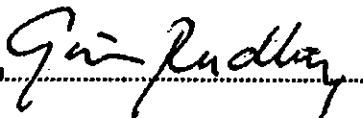
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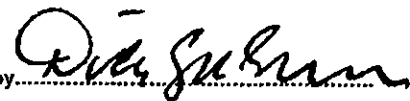
Peter Sjöström

- (b) Video recording of interviews with victims have been conducted in the same extent as in the previous audit. Given the great value as a documentary by video recording has, it should be in a much greater extent (2007 Report).
21. I was provided with the public police report files which were provided to the press by the police from 21 August to 31 August and given to me by a media organisation who had requested my commentary. I am instructed that Mr Assange's lawyers had not been provided this file despite the fact it had been provided to the press and that this was not disclosed to them by the Prosecutor until 21 January 2011 and then only in Swedish language.
22. I noted from the police file that Sofia Wilén is interviewed by Imeli Krans on 20 August, starting 16.21 ending 18.40. Mr Assange is arrested at 17.00, before the first interview is finished. Anna Ardin is interviewed by Sara Wennerblom the following day 21 August, starting at 11.31 ending 12.20. Both complainants are interviewed on suspicion they have suffered rape. Ms Ardin was interviewed over the telephone for fifty minutes, initially on a rape allegation. This is not in line with recommendations. Interviews should be video documented and they should be in person. Interviews should not be conducted over the phone.
23. In an article on my blog 14 December I point out, for the first time, the interviews are written as a summary of the interview. The recommendation is that all interviews in rape cases should be video-taped, or if that is not possible the interview should at least be tape recorded. It is especially important in rape cases. It is very important that the actual words from the victims are recorded, and that the interview is documented in dialogue form. The reason is that if there is something missed in the beginning of an investigation it is likely that the error cannot be corrected later in the investigation. Information lost in the beginning is often is gone forever. The two accusers are interviewed on two different days by two different interrogators even though they came to the police station together. This means that there is no way for the interrogator to seriously investigate the reason why the two females came to a police station to report the same man for serious sex crimes that happened a number of days earlier. The police did not make any effort to investigate the relationship between the accusers nor did they not make an effort to find out what had transpired between the accusers and the accused between the alleged crime and the time of the police report nor the reason

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why the accusers waited for a number of days to report the crime. It is evident from the police reports that the police were mostly interested in the detailed facts of the sexual acts. They did not investigate the circumstances around the crime, how come they were involved in sex and their feelings about it.

24. In the course of my studies of the politics of Sweden, I have become aware of matters of public record relating to Claes Borgstrom and Anna Ardin. Both are well known political figures in the Social Democrat Party, especially Claes Borgström. He was the spokesperson for gender equality issues in the Social Democrat Party and an important player in the general election on 19 September 2010. If the Social Democrats had been successful in the election, Claes Borgström would have been a member of the cabinet.
25. Anna Ardin has stood for parliament as a Social Democrat in the 2002 elections when she was very young and was running in 2010 elections for a seat on the Stockholm City Council. Mr Borgström was appointed as a lawyer acting on behalf of the accusers ("målsägarbiträde") on 24 August 2010 and immediately started a media campaign against the decision of Eva Finné and made a great deal of publicity out of his appeal to Marianne Ny against Eva Finné's decision to close the rape investigation.
26. I should add, in relation to the cast of Social Democrats who are involved in this case, that the policewoman who interviewed the alleged rape victim, Irmeli Krans, is also a well known Social Democrat and police officer. She also stood for election to the City Council of Stockholm in the 2010 elections.

Signed.....

Gär Rudin

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Per Eriksson