

S-071482
NO.
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

**WAYNE CROOKES and
WEST COAST TITLE SEARCH LTD.**

PLAINTIFFS

AND:

**KATHRYN HOLLOWAY, HAYLEY EASTO, CATHARINE JOHANNSON,
GARETH WHITE, FRANK CAMERON, MARK FRANCIS, COCEVE, INC.,
MYSPACE, INC., YAHOO! INC. and ANONYMOUS**

DEFENDANTS

WRIT OF SUMMONS

(Name and address of each Plaintiff)

Wayne Crookes and West Coast Title Search Ltd.
c/o 1200 - 805 West Broadway
Vancouver, BC V5Z 1K1

(Name and address of each Defendant)

KATHRYN HOLLOWAY,
743 Queen Street East
Toronto, ON M4M 1H3

HAYLEY EASTO,
98 Muir Ave. #2
Toronto, ON M6H 1G1

CATHARINE JOHANNSON,
860 Mountain Avenue
Winnipeg, MB R2X 1C3

GARETH WHITE,
104 Adams Street
Cambridge, ON M3C 2K6

FRANK CAMERON,
3270 Bathurst Street
North York, ON M6A 3A8

MARK FRANCIS,
#111 – 120 Perth Avenue
Toronto, ON M6P 4E1

COCEVE, INC.,
2735 Skyfarm Drive
Hillsborough, CA 94010-6349 USA

MYSPLACE, INC.,
6060 Centre Drive
Suite 300
Los Angeles CA 90045 USA

YAHOO! INC.
701 First Avenue
Sunnyvale CA 94089 USA

ELIZABETH THE SECOND, by the Grace of God, of the United Kingdom, Canada and Her other Realms and Territories, Queen, Head of the Commonwealth, Defender of the Faith.

To the Defendants HAYLEY EASTO, KATHRYN HOLLOWAY, CATHARINE JOHANNSON, GARETH WHITE, FRANK CAMERON, MARK FRANCIS, COCEVE, INC., MYSPACE, INC., YAHOO! INC.

TAKE NOTICE that this action has been commenced against you by the Plaintiff(s) for the claim(s) set out in this Writ.

IF YOU INTEND TO DEFEND this action, or if you have a set off or counterclaim which you wish to have taken into account at the trial, **YOU MUST:**

(a) **GIVE NOTICE** of your intention by filing a form entitled "Appearance" in the above registry of this court, at the address shown below, within the Time for Appearance provided for below and

YOU MUST ALSO DELIVER a copy of the "Appearance" to the plaintiff's address for delivery, which is set out in this writ, and

(b) if a statement of claim is provided with this writ of summons or is later served on or delivered to you, **FILE** a Statement of Defence in the above registry of this court within the Time for Defence provided for below and **DELIVER** a copy of the Statement of Defence to the plaintiff's address for delivery.

YOU OR YOUR SOLICITOR may file the "Appearance". You may obtain a form of "Appearance" at the registry.

JUDGMENT MAY BE TAKEN AGAINST YOU IF

(a) **YOU FAIL** to file the Appearance within the Time for Appearance provided for below,
or

(b) **YOU FAIL** to file the Statement of Defence within the Time for Defence provided for below.

TIME FOR APPEARANCE

If this writ is served on a person in British Columbia, the time for appearance by that person is 7 days from the service (not including the day of service).

If this writ is served on a person outside British Columbia, the time for appearance by that person after service, is 21 days in the case of a person residing anywhere within Canada, 28 days in the case of a person residing in the United States of America, and 42 days in the case of a person residing elsewhere.

Time for Defence

A Statement of Defence must be filed and delivered to the Plaintiff within 14 days after the later of

(A) the time that the Statement of claim is served on you (whether with the Writ of Summons or otherwise) or is delivered to you in accordance with the Rules of Court, and

(B) the end of the Time for Appearance provided for above. [OR, if the time for defence has been set by order of the court, within that time.]

(1) The address of the registry is:	800 Smithe Street, Vancouver, B.C.
(2) Plaintiff's ADDRESS FOR DELIVERY is:	see (3) below. Fax number for delivery: 604-874-5551
(3) Name and office address of Plaintiff's solicitor (if any):	

Robert A. Kasting
Stewart, Aulinger & Company
Barristers & Solicitors
1200 - 805 West Broadway
Vancouver, B.C. V5Z 1K1
Telephone: 604-879-0291


THE PLAINTIFF'S CLAIM IS:

(See attached Statement of Claim)

Endorsement on Originating Process for Service Outside British Columbia.

The Plaintiff claims the right to serve this writ on the defendants outside British Columbia on the ground that the proceeding is founded on a tort committed in British Columbia (see Rule 13 (1)(h) of the BC Rules of Court).

DATED: 2 March 2007


Solicitor for the Plaintiff

NO.S071482
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

WAYNE CROOKES and
WEST COAST TITLE SEARCH LTD.

PLAINTIFFS

AND:

KATHRYN HOLLOWAY, HAYLEY EASTO, CATHARINE JOHANNSON,
GARETH WHITE, FRANK CAMERON, MARK FRANCIS, COCEVE, INC., MYSPACE,
INC., YAHOO! INC. and ANONYMOUS

DEFENDANTS

Form 6

Endorsement on Originating Process for Service Outside British Columbia

The Plaintiff claims the right to serve this writ on the Defendants outside British Columbia on the ground that it concerns a tort committed in British Columbia as enumerated in s. 10(b) (g) of the *Court Jurisdiction and Proceedings Transfer Act*.

NO
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

Between:

WAYNE CROOKES and
WEST COAST TITLE SEARCH LTD.

Plaintiffs

And:

KATHRYN HOLLOWAY, HAYLEY EASTO , CATHARINE JOHANNSON,
GARETH WHITE, FRANK CAMERON, MARK FRANCIS, COCEVE, INC.,
MYSPACE, INC., YAHOO! INC., and ANONYMOUS

Defendants

STATEMENT OF CLAIM

(Writ of summons served herewith)

1. The Plaintiff WAYNE CROOKES (the "Individual Plaintiff") is a businessman who resides at 5775 Toronto Road, Vancouver, British Columbia.
2. The Plaintiff WEST COAST TITLE SEARCH LTD. (the "Corporate Plaintiff") is an incorporated body which does business throughout British Columbia, acting as an agent for lawyers, notaries and other business professionals in process serving, searching, filing and registration of legal documents, including court documents and land title documents. It has an address for business of 99 – 6th Street, New Westminster, British Columbia. The Individual Plaintiff is the president and sole shareholder of the corporate Plaintiff.
3. The Defendant KATHRYN HOLLOWAY, whose occupation is unknown, resides at 743 Queen Street East, Toronto, Ontario.
4. The Defendant HAYLEY EASTO, whose occupation is unknown, resides at 98 Muir Ave. #2, Toronto, Ontario.

5. The Defendant CATHARINE JOHANNSON is a courier and resides at 860 Mountain Avenue, Winnipeg, Manitoba.
6. The Defendant GARETH WHITE is an engineer with a business address of 104 Adams Street, Cambridge, Ontario.
7. The Defendant FRANK CAMERON is a librarian who resides at 3270 Bathurst Street, North York, Ontario.
8. The Defendant MARK FRANCIS, whose occupation is unknown, resides at #111 – 120 Perth Avenue, Toronto, Ontario
9. The Defendant COCEVE, INC. (“COCEVE”), is an incorporated body with a place of business and address for service of 2735 Skyfarm Drive, Hillsborough, California, United States of America.
10. The Defendant MYSPACE, INC. (“MYSPACE”), is an incorporated body with a place of business and address for service of 6060 Centre Drive, Suite 300, Los Angeles California, United States of America.
11. The Defendant YAHOO! INC. (“YAHOO”), is an incorporated body with a place of business and address for service of 701 First Avenue, Sunnyvale, California, United States of America.
12. Each of the Defendants libeled the Individual Plaintiff and some of the Defendants have libeled the Corporate Plaintiff in the circumstances which follow.

Libel by Kathryn Holloway, Hayley Easto, Catherine Johannson, Gareth White, and Frank Cameron

The Council2006 libel
13. The Defendants Holloway, Easto, Johannson, White and Cameron (the “Individual Defendants”) were the moderators, editors, and publishers of a website with a url of:

<https://Council2006.PBWiki.com/?msg=Please%20enter%20the%20wiki%20password> (the "Council2006 website"). As such, each of them had care and control over the contents of postings on that site. Each also has knowledge of the names of persons who post anonymously on this website. The site has password access and world wide circulation through the internet.

14. On or about May 10, 2006, an anonymous article was written and posted on the Council2006 website, which contained the following statement:

Anonymous trolls have the right to post public information or anything that can be verified to this wiki. We don't care who they are, and we punish those who demand to know who they are, like Connie Jantz, who will be eliminated.

Trolls, please continue to post your dirt here. This is the place for it all.

Do not be intimidated by lawsuit-loving bunker-loving scum who try to bait you into telling them who you are. You will certainly face lawsuit tactics by Wayne Crookes, ESPECIALLY if what you are saying about these people is true.

It is because of characters like Crookes..., that anonymous trolls are necessary.

(the "Council2006 words")

15. The Council2006 words in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to mean and understood to mean that the Individual Plaintiff is disreputable, is a bully, abuses the legal system, and is contemptible and not deserving of respect.

16. The words were false and malicious and libel the Individual Plaintiff.

17. The author of the Council2006 words is the Defendant Anonymous.

18. The words were removed from the Council2006 website at the request of the Individual Plaintiff by the wiki provider, the Defendant COCEVE.

19. The Individual Plaintiff has requested from the Individual Defendants, an apology for the appearance of the Council2006 words on the website and the name of the Defendant Anonymous.

20. None of the Individual Defendants have provided the Individual Plaintiff with the name of the Defendant Anonymous.

21. The Defendant Holloway has offered a conditional apology, but has refused to make the apology public and has refused to repudiate the libel.

22. The Defendant Easto has denied that she was a moderator of the site, and has refused to apologize for the libel or repudiate the libel.

23. The Defendant Johannson has refused to offer an apology for the libel and has refused to repudiate the libel.

24. The Defendant White has refused to offer an apology for the libel and has refused to repudiate the libel.

25. The Defendant Cameron has denied that he is a moderator of the site and has refused to apologize for the libel and refused to repudiate the libel.

The GPC-Members libel

26. The Defendants Holloway, Easto, Johannson, White and Cameron are also the moderators, editors, and publishers of a website GPC-Members@yahoo.com with a url of <http://groups.yahoo.com/group/GPC-Members>. (the "GPC-Members website"). As such, they had care and control over the contents of postings on that site. The site has password access and world wide circulation through the internet.

27. On or about June 16, 2006, Message #5214 was posted by Craig Hubley, the relevant contents of which are the following:

This proves the lack of integrity of the bunker, as if any more such proof was required.

*They (**including Wayne Crookes**) are all horny for "solidarity" when Jim's expenses are questioned in a proper and formal Elections Canada complaint, and lie and lay on the libel suits (SLAPP suits actually).*

28. On or about August 2, 2006, Message #6248 was posted by Michael Pilling, the relevant contents of which are the following:

Wayne Crookes, and Jim Harris and their allies practise a form of old school politics... "the abuse of power" vs. "the abuse of participation"...

Very simply put, in the old school the danger is the abuse of power:

*cover-ups,
persecution of opponents,
bending or breaking the rules,
misallocation of resources,
self serving decisions.*

Bottom line: Old school politics rots from the inside out.

29. At the request of the Individual Plaintiff to the internet service provider, the Defendant Yahoo, this message was removed. It was reposted on August 8, 2006 as Message #6358 by the Defendant Francis.

30. On or about August 2, 2006, a message was posted by Michael Pilling, the relevant contents of which are the following:

Wayne Crookes is (once again) taking legal action against people he considers to be his political opponents over what he considers to be defamatory statements against him...

There seem to be a clique of individuals currently in the upper rungs of the GPC who think that democracy does not include the right to criticize those in power....

31. At the request of the Plaintiff to Yahoo, this message was removed. It was reposted on August 8, 2006 as Message #6398 by the Defendant Holloway.

32. On or about August 17, 2006, Message #6639 was posted by Craig Hubley, the contents of which are the following:

One must thoroughly clean out a cavity or septic wound first, before one puts the bandage on. Liars and protocol abusers who refuse to document or follow procedures for sensitive matters, don't declare conflicts of interest, etc., really must all be removed before there can be any talk about unity....

You don't bandage a wound until it's clean. It's not clean in the GPC yet: until Colton, Kisby, Hulet, Harris, Crookes, Travis, Hartley, Anderson, Manickam, Marchetti, are gone at least from committees and councils, you'll continue to lose good people who won't "work with" such trash. All of these people have been caught in deliberate lies or repeating of statements they have been informed are lies.

33. On or about August 17, 2006, Message #6639 was reposted by the Defendant Frank Cameron, as Message #6640, adding the following:

Ah Craig, thank you for your thoughts...Feel free to shout out publicly folks.

34. On or about August 17, 2006, Message #6639 was republished by Craig Hubley together with Message #6640 as Message #6652.

35. On or about August 17, 2006, Message #6649 was posted by Craig Hubley, the relevant contents of which are the following:

In an officially non-violent society, liars may do as they please, and suffer no consequences, as they are not arrested or confined for it—they can fleece new victims faster than old victims can recover what was fleeced from them. Thus there is no remedy other than to mark or silence them so others know they are liars. Perjurors (sic) in old Quebec, for instance, were branded on the tongue. While perjury is a way of life for Bay Street and Howe Street where Jim Harris and Wayne Crookes get their lawyers.

36. On or about August 22, 2006, Message #6766 was posted by Craig Hubley, the partial contents of which are the following:

I would urge extremely fatous (sic) and mocking responses to Mr. Crookes, as they stand a good change of making a judge laugh out loud at the guy. Crookes becoming a laughing stock is likely the only way to end this...Personal public humiliation is the only thing that makes this kind of creep go away. And even then it takes a while...

The suit objected mostly to the phrase "gang of Crookes" being used to describe Crookes' allies in the GPC bunker...In politics this is not a really outrageous phrase to use, but my own analysis that they did in fact behave exactly like a criminal gang and advocated having no due process at all, probably annoyed Crookes because (sic) it was provably true...

I don't much care what BC law says, it was written by crookes anyway: those who used to run the Howe Street scams that made Forbes call Vancouver in 1989 "the scam capital of the world". ...

More news about this case as it happens. In the meantime go google "gang of Crookes" and "Crookes lawsuit" and see what you find...Crookes is making very sophisticated enemies. Well, he was warned.

37. On or about August 23, 2006, Message #6794 was posted by Craig Hubley, the partial contents of which are the following:

Basically, crooked lawyers wrote the "libel" laws of BC and of Ontario specifically to enable their thieving clients to file suits against journalists and whistleblowers for telling the truth. This revolting situation leads in turn to abuses by persons like Crookes, and gangs of crooks (sic) selling bogus securities, taking over the public companies and political parties, etc....

Again, it comes back to whether you have the right to ignore SLAPP or not. If you have to pay attention and hire lawyers, you don't have an equal right of public participation against those who can hire them to pay attention for them. That's why Crookes must be stopped NOW before he strategically inhibits participation from dozens of other people or groups. It only gets worse, if you don't kick the crookes out fast...

38. On or about August 26, 2006, Message #6831 was posted by Craig Hubley, the partial contents of which are the following:

But it's a far better strategy to maximize coverage of openpolitics.ca among progressive bloggers and wiki trolls angered by this censorship and to point out Wayne Crookes' SLAPP suit against openpolitics.ca hilariously named "Crookes versus open politics"...lol. Everyone loves that. Keep saying it.

This can be fun. Imagine starting a pile of other services with official generic names like "honest people", "plain citizens", etc, would be great because then his new suits have to be called "crookes versus honest people", "crookes versus plaint citizens" etc....

So the overall strategy should go something like this:

- 1. Highlight openpolitics.ca links wherever you can. For instance, add them to Wikipedia article pages, including talk pages, and blog entries, and rabble.ca/babble (no friend of Crookes), etc, and be sure to get them on RSS feeds everywhere. Wikipedia is the highest priority since its pages are mirrored by hundreds of other services.*

2. Contact the bloggers and wikis that link to you, and ask them all to connect directly to openpolitics.ca pages on topics they care about- and to improve those pages, e.g. by looking at past versions and putting the most damning material that can be verified back up front and visible, e.g. by adding full pages on any political figure or officer that they know (from any party) relying on press reports etc.

It's nice to have links through you, but you need as many of these as possible using openpolitics.ca references directly. Get moles on the EDAs, provincial party and even GPC committees, to add such links to innocuous openpolitics.ca pages that explain basic politics concepts ...

Also such direct links boost the google count for openpolitics.ca and maximize the chance that major media will be reading it more closely.

A well-timed story about bunker antics and GPC staff behaviour right now is required to provide the momentum to totally clean out the vile bunker....

(all of the words set out in the paragraphs 27 through 38 above are referred to as the "GPC-Members words")

39. The GPC-Members words in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to mean and understood to mean that the Individual Plaintiff is dishonest, disreputable, a bully, abuses power, and is contemptible and not deserving of respect.

40. The GPC-Members words are false and malicious and libel the Individual Plaintiff. They further urge the wide dissemination of libel against the Individual Plaintiff.

41. The Individual Plaintiff has requested of the Defendants Holloway, Easto, Johannson, White, and Cameron that the GPC-Members words be removed from the website, the words be repudiated and that an apology be issued to the Individual Plaintiff.

42. The Defendant Holloway has offered a conditional apology, but has refused to make the apology public and has refused to repudiate the libel.

43. The Defendant Easto has offered a conditional apology and has refused to repudiate the libel.

44. The Defendant Johannson has refused to apologize for the libel and has refused to repudiate the libel.

45. The Defendant White has refused to apologize for the libel and has refused to repudiate the libel.

46. The Defendant Cameron has refused to apologize for the libel and refused to repudiate the libel.

The OpenPolitics libel

47. The GPC-Members website also contains hyperlinks to a website with a url of <http://www.OpenPolitics.ca> , (the "OpenPolitics website"). This website has unrestricted access and world wide circulation. It contains the following statements, all posted at various times since March 15, 2005:

a. ***Gang of Crookes***

The phrase 'Gang of Crookes' is used as a pejorative nickname for a GPC faction which its apologists call the GPC Leader clique or "friends of Crookes".

The term 'Gang' is both an accusation of criminal-like intent and organizing structure...and a play on Wayne Crookes's perhaps unfortunate name. Because it may be reasonably assumed that Gang is only a play on his name, this is not a good name for publicity purposes. The criminality of the gang is based on its reliance on a single command hierarchy and its willingness to lie, break rules, and steal money allocated to other groups.

The essential criminality of the Gang was established through many of their actions in the GPC Council Crisis, which involved illegal displacement of CPC Council officers and the wholesale disregard for the GPC Constitution...

Elio Di Iorio resigns GPC Council, 2005-06-19, citing \$250,000 in funds effectively being embezzled as they are being spent on personal promotion of the leader not the GPC Shadow Cabinet as a whole, and have not been scrutinized nor effective at reaching the mass media....

The underlined words friends of Crookes, Wayne Crookes, GPC Council Crisis, and single command hierarchy are hyperlinked to postings referred to elsewhere in this Paragraph.

b. **Friends of Crookes**

Wayne Crookes is the GPC's main creditor, having financing it through the Canadian federal election, 2004 during which he held the title "Campaign Manager, Green Party of Canada"...Those who continue to support him include, the friends of Crookes, form a faction in the GPC Council Crisis often called the GPC Leader Clique or the "Gang of Crookes" for some obvious and non-obvious reasons that are explained in depth in those articles, notably: "its reliance on a single command hierarchy and its willingness to lie, break rules, and steal money allocated to other groups"....

Who are Crookes'?

The friends include at least those individuals who support the GPC's major creditor Wayne Crookes, and his partner Debbie Hartley in controlling the GPC's day to day operations....

What did they do?

There are too many accusations to list here...

Elio Di Iorio resigns GPC Council, 2005-06-19, citing \$250,000 in funds effectively being embezzled as they are being spent on personal promotion of the leader not the GPC Shadow Cabinet as a whole, and have not been scrutinized nor effective at reaching the mass media....

Status of plans

The "simplicity" offer by this group was characterized by Craig Hubley "as being that of gangsters in a mob, a crime family, or particularly irresponsible corporation or clique," which likewise seeks unlimited assent to "(1) a simple plan that it executes relentlessly and without diversion from priorities".

The underlined words Wayne Crookes, and Gang of Crookes are hyperlinked to postings of the same name referred to elsewhere in this Paragraph.

c. **Wayne Crookes**

Wayne Crookes is a British Columbia businessman who runs a business called West Coast Title Search...

Certain friends of Crookes, known for their organizing style as the "Gang of Crookes" have been accused of having strong and specific motivations to seize control of the Green Party of Canada, which as of 2005-06 they had effective (sic) done. ...

He was a shadowy figure on the de facto/secret GPC Advisory Board until he became GPC ERCT Chair, to protect his own "investment" in the Green Party of Canada. It is not clear what policy concessions or contracts he had been promised. It is very clear he is partly responsible for the GPC Council crisis.

The underlined words friends of Crookes, Gang of Crookes and GPC Council crisis are hyperlinked to postings of the same name referred to elsewhere in this Paragraph.

d. **GPC Council Crisis**

libel chill by Crookes

Online accounts of the situation including this page, and other mention on Wikipedia drew the ire of Wayne Crookes, who by July was demanding visible and public apologies from, and threatening libel lawsuits, various GPC members (including but in no way limited to those whose resignation letters are linked above). ...

The libel chill tactic remains a common one in Canadian business, employed by such notables as Garth Drabinsky and Conrad Black, who use it to silence critics of their activities, which were later found to be literally criminal. The term: Gang of Crookes has been used to likewise describe GPC management.

The underlined passages Wayne Crookes and Gang of Crookes are hyperlinked to the posting of the same name referenced above. The underlined passage libel chill is hyperlinked to a posting on openpolitics.ca which reads as follows:

So-called libel chill is a legal tactic whereby typically arbitrary and sometimes ungrounded claims that libel has occurred are used as a pretext to force critics to silence or mute published concerns. It is commonly engaged in by people who are later discovered to be criminals, notably:

- *Conrad Black*
- *Garth Drabinsky.*

e. **GPC officer**

A Green Party of Canada officer is a person who actually upholds the GPC constitution.

There are as of 2005-02 no lawful GPC officers that execute and uphold that document. During the GPC Council Crisis, a small group called the Gang of Crookes were able to seize unlawful control of the GPC's finances, against the Canada Elections Act provisions against a donor spending funds they themselves have donated. This being Wayne Crookes.

The sequence of acts in which they seized control of the funds, silenced the officer elected to oversee the processes they derailed, used lies and libel on GPC-COUN to manipulate the outcomes of GPC Council meetings, and ultimately "fired" or forced responsible officers to resign, is well documented and the subject of a large number of well grounded complaints.

The net effect is that those who facilitate the current effort to embezzle GPC funds, and claim to “be” the officers, au be “criminals according to the Canada Elections Act,” due to their being accomplice after the fact to the seizure. The position that the actions are illegal is taken by Hayley Easto in the letter in which she resigns.

The underlined passages Wayne Crookes, Gang of Crookes and Wayne Crookes are hyperlinked to the postings of the same name referenced above.

f. **Crony**

A crony of a political part leader is someone who will do “dirty work” for them in exchange for that leader’s protection and patronage.

For instance, to run smear campaigns, hide truth from sight, engage in libel chill, file false police reports, false regulatory complaints and so on. Sometimes called politics as usual, although politics is usually thought to involve more that this, such as actually authoring legislation or treaty terms.

examples:

- *G. Gordon Liddy was a crony of his leader Richard Nixon*
- *Kevin Colton is a crony of his leader Jim Harris.*

What distinguishes a crony is their wholly uncritical and seemingly loyal willingness to hide facts and lie for their leader. However they will usually shift to new leader quickly.

cliques

Cronies normally gather in a clique around a leader. Usually the cronies are aware that none of them could actually take the leadership themselves, and so support a weak-minded or malleable person who will ensure they retain fulltime staff positions. The Green Party of Canada was taken over by such a clique in 2005 – see ERCT, GPC Council Crisis, GPC whistleblower crisis, 2006, fire the spin doctor, fire GPC fulltime staff and Claude Genest who vowed to “return” the party to its democratic methods.

Exposing cronies and cliques

A major purpose of openpolitics.ca itself is to very closely examine the ethics and positions of any such person – see notices- or group, e.g. friends of Crookes associated with Wayne Crookes.

Activities online

Online, a typical crony is easy to spot by their lack of imagination and their willingness to spin instead of answering to substantive concerns. Often they lack the talent to become trolls and may be orcs instead, simply harassing known trolls.

These strategies often backfire as the crony lacks the imagination, talent, intellectual integrity, and other attributes required to actually engage in real politics and achieve real results. While not all leaders and certainly not all trolls have those powers, they do typically have more than a typical crony, if only because leaders and trolls face more scrutiny and examination.

The underlined words friends of Crookes and Wayne Crookes are hyperlinked to the postings of the same name referenced above.

g. GPC Fundraising Chair

The GPC was obviously taken over by Wayne Crookes, a creditor, who demanded to control the fundraising –the party’s democratically-elected officer had her GPC Council vote removed and the GPC Fundraising Committee vote also.

There has probably never been such a bald attempt by a creditor or political party donor to “buy” a party.

The GPC is not trustworthy and is obviously run by people who are only interested in stealing public funds using a cute name with no democratic accountability.

The underlined words Wayne Crookes are hyperlinked to the posting of the same name referenced above.

h. Julian West

Either one aligns with Jim’s agenda or one engages in endless and ultimately futile debate. You align or you resign. Jim’s obsessive and completely successful drive to move “the party” forwards as he sees fit; his ability to surround himself with those like Wayne Crookes, who can also gain something at a personal level, is simply stunning.

The underlined words Wayne Crookes are hyperlinked to the posting of the same name referenced above.

i. next GPC Constitution

...The next GPC Constitution is proposed to contain at least:...

- *Clear recognition of grave conflict of interest problems certain to cause legal and moral hazards and means of dealing with them by removal or otherwise:

 - *Major political party donors taking on posts that spend or distribute the funds that they “gave” the party, eg Wayne Crookes ...**

...

Pages clarifying responsibilities of current bodies and roles and performance problems of those bodies and persons in those roles, or failure of those roles to prevent abuses

- Overcontrol by GPC fulltime staff and recourses
 - Wayne Crookes
 - Gang of Crookes and conflict of interest

The underlined words Wayne Crookes and Gang of Crookes are hyperlinked to the posting of the same name referenced above.

j. single command hierarchy

A single command hierarchy is an absolute monarchist fascist, criminal gang, mafia, or corporatist model. All organizational protocols in this model terminate with a final unappealable decision by one person at "the top" of the command hierarchy. Even if other hierarchies exist, e.g. legislative, judicial, religious, academic, military, press, these are subordinated to the rule of the one. Examples:

- *Napoleon Bonaparte*
- *Saddam Hussein*
- *Robert Mugabe*
- *Adolph Hitler*
- *Genghis Khan*
- *Jim Harris as puppeteered by the Friends of Crookes*
- *Louis XIV*
- *Stalin*

The underlined words Friends of Crookes are hyperlinked to the posting of the same name referenced above.

k. Debbie Hartley

...Friends of Crookes seem to believe that neither Holloway or Racicot are qualified to serve the party in significant roles....Also, the record shows that structures and processes administered by Crookes and Hartley lead inevitably to resignations and breaches of trust.

...In other words, it would have happened, except for appearances' sake regardless of her prior performance, had it not been for pressure on Hartley, Crookes, and Harris, to avoid further cronyism and nepotism...

The underlined words Friends of Crookes are hyperlinked to the posting of the same name referenced above.

(all of the words set out in this Paragraph are known collectively as the "OpenPolitics words")

48. The OpenPolitics words in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to mean and understood to mean that the Individual Plaintiff is dishonest, a bully, abuses power, lacks integrity, and is a person of disreputable character. Further, the words were intended to mean and understood to mean in their context and in innuendo that the Corporate Defendant shares similar characteristics as its principal.

49. The OpenPolitics words are false and malicious and libel the Plaintiffs.

50. The Individual Plaintiff has asked the Defendants to delink the GPC-Members website from the OpenPolitics website and apologize. He has also requested the name of the authors of the OpenPolitics words.

51. None of the Defendants have provided the Plaintiff with the name of the authors of the OpenPolitics words.

52. The Defendant Holloway has offered a conditional apology, but has refused to make the apology public and has not repudiated the libel.

53. The Defendant Easto has offered a conditional apology and has not repudiated the libel.

54. The Defendant Johannson has refused to offer an apology for the libel and has not repudiated the libel.

55. The Defendant White has refused to offer an apology for the libel and has not repudiated the libel.

56. The Defendant Cameron has denied that he is a moderator of the site and has refused to apologize for the libel and refused to repudiate the libel.

57. The Defendants Holloway, Easto, Johannson, White, and Cameron have refused to delink the GPC-Members website from the OpenPolitics website.

58. The Defendants Holloway, Easto, Johannson, White, and Cameron, as moderators, editor and publisher of the GPC-Members website are publishers of the hyperlinked words and have libeled the Plaintiffs.

The USGovernetics libel

59. The GPC-Members website also hyperlinked to a website with a url of <http://www.USGovernetics.com> (the "USGovernetics website") which has unrestricted access and world wide circulation. This website contained an article, written anonymously at an unknown date after March 15, 2005 and entitled "Wayne Crookes" which contained the following statements:

Some of these (resignation letters) used strong language ("fraudulent", "illegal") that led to the epithet gang of Crookes becoming a common way to refer to Crookes and his colleagues and favourites."

The underlined words gang of Crookes are hyperlinked to the posting referred to above among the OpenPolitics.ca words.

(the "USGovernetics words")

60. The USGovernetics words in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to mean and understood to mean that the Individual Plaintiff is dishonest and a person of disreputable character who abuses power.

61. These words are malicious and untrue and libel the Individual Plaintiff.

62. The Plaintiff requested that these Defendants delink the GPC-Members website from the USGovernetics website and apologize for the hyperlinkage.

63. The Defendant Holloway has offered a conditional apology, but has refused to make the apology public. She has not repudiated the libel.

64. The Defendant Easto has offered a conditional apology and has not repudiated the libel.

65. The Defendant Johannson has refused to offer an apology for the libel and has not repudiated the libel.

66. The Defendant White has refused to offer an apology for the libel and has not repudiated the libel.

67. The Defendant Cameron has denied that he is a moderator of the site and has refused to apologize for or repudiate the libel.

68. The Defendants Holloway, Easto, Johannson, White, and Cameron have refused to delink the GPC-Members website from the USGovernetics website.

69. The Defendants Easto, Holloway, Johannson, White, and Cameron, as moderators, editors and publishers of the GPC-Members website are publishers of the hyperlinked words and the sites they are hyperlinked to and have libeled the Individual Plaintiff.

Additional libel by Kathryn Holloway

The GPC-Members libel

70. In addition to the libels referred to above, the Defendant Holloway has further libeled the Individual Plaintiff.

71. In a posting #6355 on the GPC-Members website dated August 8, 2006, the Defendant Holloway wrote that the USGovernetics site (referred to in this Statement of Claim in Paragraph 59 above) was "a very good summary of Wayne Crookes and associates", thereby republishing the libel.

The MySpace libel

72. The Defendant Holloway is the owner and author of the contents of a personal webpage with a url of <http://www.MySpace.com/greenkateholloway> . This website has

unrestricted access and world wide circulation. On this webpage, and at an unknown date after March 15, 2006, the Defendant Holloway posted an article, which reads as follows:

The issue is intermediaries such as openpolitics.ca, or my own council2006.wiki, and whether or (not) (sic) Canadian libel law will protect the dubious dignity of folks like Crookes at the expense of freedom of speech.

(the "MySpace" words)

73. The MySpace words, in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to mean and understood to mean that the Individual Plaintiff is without dignity and were intended to subject the Individual Plaintiff to ridicule.

74. The words are false and malicious and libel the Individual Plaintiff.

75. The Plaintiff has requested a repudiation of the libel and an apology. The Defendant Holloway has offered a conditional apology and has not repudiated the libel.

The FreshStart libel

76. The Defendant Holloway is the publisher, editor or moderator of a website known as FreshStart with a url of <http://councilFreshStart.ca>. It has unrestricted access and world wide circulation. That website links to the MySpace website referred to above in Paragraph 72, which libels the Individual Plaintiff as alleged in Paragraphs 73 and 74 above and to a website with a url of <http://www.ConstantineForChair.ca>, which linked to libel contained in the OpenPolitics website and libels both Plaintiffs as alleged in Paragraphs 47 to 49 above.

77. The Defendant Holloway, through the linking of the FreshStart website with the two websites referred to, is a publisher of the libels contained on the MySpace website and the OpenPolitics website.

Libel by Mark Francis

The GPC-Members libel

78. On June 16, 2006, the GPC-Members website posted Message #5214, written by Craig Hubley, the message which stated the following:

This proves the lack of integrity of the bunker, as if anymore such proof was required...

*They (**note: including Wayne Crookes**) are all horny for "solidarity" when Jim's expenses are questioned in a proper and formal Elections Canada complaint, and lie and lay on the libel suits (SLAPP suits actually).*

79. At the Individual Plaintiff's request, this message was again deleted by the Defendant Yahoo. On August 8, 2006 the Defendant Francis reposted Message #5214 as message #6359.

80. The words in Message #5214, in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to mean that the Individual Plaintiff is dishonest.

81. Message #5214 was false and malicious and libelled the Individual Plaintiff.

82. By re-posting Message #5214 together with the comments set out in Message #6359, the Defendant Francis republished the libel and thereby further libelled the Individual Plaintiff.

83. On August 2, 2006, the GPC-Members website posted Message #6248, written by Michael Pilling, the content of which was the following:

Wayne Crookes, and Jim Harris and their allies practise a form of old school politics..."the abuse of power" vs. "the abuse of participation"...

Very simply put, in the old school the danger is the abuse of power:

*cover-ups,
persecution of opponents,
bending or breaking the rules,*

*misallocation of resources,
self serving decisions.*

Bottom line: Old school politics rots from the inside out.

84. At the Individual Plaintiff's request the Defendant Yahoo removed this message. On August 8, 2006, it was reposted by the Defendant Francis as Message #6358 with the following words:

*This is the first confirmed message that was deleted. #6248. Please save it.
Heck, spread it around.*

85. The words in Message #6248, in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to mean that the Individual Plaintiff abuses power and is dishonest.

86. Message #6248 was false and malicious and libelled the Individual Plaintiff.

87. By re-posting Message #6248 together with the comments set out in Message #6358, the Defendant Francis republished the libel and thereby further libelled the Individual Plaintiff.

88. On or about August 26, 2006, Craig Hubley posted Message #6831 on the GPC-Members website. The contents of this message is referred to above in Paragraph 38. This message was republished by the Defendant Francis on the same day, further libelling the Plaintiff.

The FreshStart libel

89. The Defendant Francis is the Administrator and Owner/Registrant of a webpage with a url of <http://councilFreshStart.ca>, and referred to as the FreshStart website. That website links to the MySpace website referred to above in Paragraphs 72 through 75 and following, which libels the Individual Plaintiff as alleged in Paragraphs 76 and 77 above and to a website with a url of <http://www.ConstantineForChair.ca>, which linked to libel contained on the OpenPolitics website which libels both Plaintiffs.

90. The Defendant Francis, through the linking of the FreshStart website with the websites referred to, is a re-publisher of the libels contained on the MySpace website and the OpenPolitics website.

Libel by all Individual Defendants

91. Further, all of the Individual Defendants have conspired among themselves, and with Craig Hubley, Michael Pilling and Anonymous to libel the Plaintiffs and to recommend and promote the libeling of the Plaintiffs.

Libel by COCEVE

92. The Defendant COCEVE, through PBWiki.com, is the host internet service provider for the Council2006 website. As such, it has control over the Council2006 website.

93. The statements which are set out in paragraphs 13 to 15 above libelled the Individual Plaintiff. As the host internet service provider, COCEVE is a publisher of the libels referred to.

94. The Individual Plaintiff requested that COCEVE remove the libels, that the COCEVE apologize for the libels, and that it provide the Individual Plaintiff with the names of the anonymous persons who have authored the libels referred to.

95. COCEVE has not repudiated the libel, has refused to apologize, and has refused to provide the Individual Plaintiff with the names of the authors of the libel.

96. In so doing, COCEVE has libeled the Individual Plaintiff.

Libel by YAHOO

97. The Defendant YAHOO is the host internet service provider for the GPC-Member website. As such, it has control over the content of the GPC-Members website.

98. The statements which are set out in paragraphs 26 to 38 above libelled the Plaintiff. As the host internet service provider, the Defendant YAHOO is a publisher of the libels referred to.

99. The Plaintiff requested of the Defendant YAHOO that the libels be removed, that the Defendant YAHOO shut down the GPC-Members website and post an apology to the Plaintiff in its place.

100. The Defendant YAHOO has refused to repudiate the GPC-Members words by shutting down the GPC-Members website or posting an apology.

101. In so doing, YAHOO has libelled the Individual Plaintiff.

Libel by MYSPACE

102. The Defendant MYSPACE is the host internet service provider for the MySpace website. As such, it has control over the content of the MySpace website.

103. The statements which are set out in paragraphs 72 to 74 above libelled the Plaintiff. As the host internet service provider, MYSPACE is a publisher of the libels referred to.

104. The Plaintiff requested that MYSPACE removed the libels, that the hyperlink between the MySpace website and the OpenPolitics website be removed, and that an apology be posted by the Defendant.

105. The Defendant MYSPACE has not repudiated the libels, and has refused to remove the libels, remove the hyperlink, or post an apology.

106. In so doing, the Defendant MYSPACE has libelled the Individual Plaintiff.

107. The libeling of the Plaintiffs by the Defendants occurred in the Province of British Columbia, and as a result of its distribution on the internet, the libel has been published throughout Canada and around the world.

108. As a result of being libeled as alleged, the continuing libel, the refusal to apologize or repudiate the libels, the taunting and belittling of the Individual Plaintiff through subsequent post-libel postings by the Individual Defendants, the Plaintiffs have suffered damages, including special, aggravated, and punitive damages.

109. As a result of the actions of the corporate Defendants as alleged, the Plaintiffs have suffered general and punitive damages.

The Plaintiffs claim as follows:

- a. General special, aggravated, and punitive damages against each of the Defendants by the Individual Plaintiff;
- b. General, special and punitive damages against each of the Individual Defendants by the Corporate Defendant;
- c. An order requiring each of the Defendants to provide to the Plaintiffs, the names and contact coordinates within their knowledge or control of the anonymous persons who have libeled the Plaintiffs;
- d. An order removing the libelous words from the offending websites;
- e. An order enjoining the Defendants and each of them from publishing further libel against either Plaintiff on their sites or third party sites;
- g. Further relief as requested.
- h. Costs pursuant to Rule 57 of the *Rules of Court*.

Place of Trial: Vancouver, British Columbia

Dated: 2 March 2007



Plaintiffs' solicitor

This Statement of Claim is filed by Robert A. Kasting, of the law firm Stewart, Aulinger & Co. 1200- 805 West Broadway, Vancouver, BC V5Z 1K1 Tel 604-879-0291 Fax 604-874-5551

