

SUPREME COURT
OF BRITISH COLUMBIA
VANCOUVER REGISTRY

APR 17 2007



S-072729
NO.
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

Between:

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

Plaintiffs

And:

**WIKIMEDIA FOUNDATION, INC.,
ANONYMOUS #1, 2, 3, 4, 5, & 6,
DOMAINS BY PROXY, INC., and JON NEWTON**

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)

WIKIMEDIA FOUNDATION, INC.,
200 2nd Avenue South #358,
Saint Petersburg, Florida,
United States of America

ANONYMOUS #1, 2, 3, 4, 5, & 6,
Addresses unknown

DOMAINS BY PROXY, INC.,
15111 N. Hayden Road, Suite 160 PMB 353,
Scottsdale, Arizona,
United States of America

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208.00

JON NEWTON

Lake Cowichan, British Columbia

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 WIKIMEDIA FOUNDATION, INC., ANONYMOUS #1, 2, 3, 4, 5, and 6, DOMAINS BY PROXY, INC., and JON NEWTON

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) Plaintiffs' ADDRESS FOR DELIVERY is:	see (3) below.
Fax number for delivery: 604-874-5551	
(3) Name and office address of Plaintiffs' solicitor (if any):	<p>Robert A. Kasting Stewart, Aulinger & Company Barristers & Solicitors 1200 - 805 West Broadway Vancouver, B.C. V5Z 1K1 Telephone: 604-879-0291</p>

THE PLAINTIFFS' CLAIM IS:

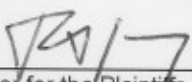
(See attached Statement of Claim)

Endorsement on Originating Process for Service Outside British Columbia.

Form 6: Endorsement on Originating Process for Service Outside British Columbia

The Plaintiffs claim 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*.

DATED: 16 April 2007


 Solicitor for the Plaintiffs

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DOMAINS BY PROXY, INC., and JON NEWTON

Defendants

STATEMENT OF CLAIM

(Writ of summons served herewith)

1. The Plaintiff WAYNE CROOKES (the "Plaintiff") is a businessman who resides at 5775 Toronto Road, Vancouver, British Columbia. He is the president and sole shareholder of the Plaintiff WEST COAST TITLE SEARCH LTD.
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 Plaintiff is the president and sole shareholder of the Corporate Plaintiff.
3. The Defendant WIKIMEDIA FOUNDATION, INC. ("WIKIMEDIA") is an incorporated body with a place of business and address for service of 200 2nd Avenue South #358, Saint Petersburg, Florida, United States of America. It is the

owner of an online, internet, interactive encyclopaedia called "Wikipedia" which has world wide distribution on the internet.

4. The Defendants ANONYMOUS #1 through #6 are persons whose identities and addresses are unknown. They are all authors and/or editors of anonymous postings on websites or owners of websites with worldwide distribution on the internet.

5. The Defendant DOMAINS BY PROXY, INC. is an incorporated body with a place of business and address for service of 15111 N. Hayden Road, Suite 160 PMB 353, Scottsdale, Arizona, United States of America. It is a proxy registration service which allows persons to register a website on the internet and maintain their anonymity.

6. The Defendant JON NEWTON, whose occupation is unknown, resides in the village of Lake Cowichan, British Columbia. He is the owner and editor of a website called "P2Pnet.net", which has worldwide distribution on the internet.

Wikipedia publication: The Wayne Crookes article

7. On or about June 17, 2006, the Defendant WIKIMEDIA published on its website, an article entitled "Wayne Crookes" written by ANONYMOUS #1 who used the pseudonym of "indycitizen". It had a url of http://en.wikipedia.org/wiki/Wayne_Crookes .

8. The article contained inter alia the following words:

Wayne Crookes...

*...Several months later, in protest to the actions of this Committee, another group of GPC Council and Committee and Shadow Cabinet members resigned with strongly worded resignation letters. Some of these 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...*

...After the election, Crookes had taken further legal actions against critics of his allies and friends in the party. As one of what Michael Geist described as a "spate of lawsuits against Canadian online news sites", in May 2006 Crookes sued openpolitics.ca, a "political chat

*site, after he objected to several comments posted on the site.” These had cited the resignation letters, discussed the gang epithet in that context, and reported the allegations of Crookes personal favourites, **friends of Crookes**, wielding power not granted to them by the membership.*

....(Crookes) pointed out no factual errors on any page, but only claimed that they implied he was “dishonest” and had “abused power”. Which was already implied by the strong language in some of the resignation letters and the other insider information cited in the articles.

(referred to as the “Wayne Crookes article”)

9. The Wayne Crookes article libels the Plaintiff. The words in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to and understood to say that the Plaintiff was dishonest and abused power and were intended to, and understood to lower the Plaintiff’s reputation and to expose the Plaintiff to ridicule and contempt.
10. As a result of authoring the Wayne Crookes article, ANONYMOUS #1 has libeled the Plaintiff.
11. On or about July 25, 2006, the Plaintiff requested that the Defendant WIKIMEDIA remove the Wayne Crookes article from its website. It did.
12. The Wayne Crookes article in substantially the same form was republished on its website on August 23, 2006 by ANONYMOUS #2, under the pseudonym of Crekshin.
13. As a result of republishing the Wayne Crookes article, ANONYMOUS #2 libeled the Plaintiff.
14. On or about September 16, 2006, the Plaintiff requested that the Defendant WIKIMEDIA remove the Wayne Crookes article from its website for the second time. It did.
15. The Wayne Crookes article in substantially the same form was republished on WIKIMEDIA’s website on November 1, 2006 by ANONYMOUS #3 using an anonymous pseudonym.

16. As a result of the republishing of the article, ANONYMOUS #3 libeled the Plaintiff.
17. On or about November 17, 2006, the Plaintiff requested that the Defendant WIKIMEDIA remove the Wayne Crookes article from its website for the third time. It did.
18. As a result of the publishing and republishing of the article as alleged, the Defendant WIKIMEDIA has libeled the Plaintiff.
19. Further, upon being advised by the Plaintiff of the libel appearing on its website, the Defendant WIKIMEDIA had a duty of care towards the Plaintiff and a standard of care to monitor its website to ensure that the libels of the Plaintiff did not reappear on its website. The Defendant WIKIMEDIA did not meet that standard of care.
20. The Plaintiff has requested an apology from the Defendant WIKIMEDIA for publishing and republishing the Wayne Crookes article and a public repudiation of the libel. It has refused both. This is an aggravation of the libel.
21. The Plaintiff has requested from the Defendant WIKIMEDIA, the names of all persons who have authored or edited the libelous articles which appeared on its website, including the names of ANONYMOUS #1, #2, and #3. The Defendant WIKIMEDIA has refused to provide these names. This is an aggravation of the libel.
22. As a result of the refusal to provide Plaintiff with the names of the anonymous Defendants, the Defendant WIKIMEDIA has acted as the agent for ANONYMOUS #1, #2, and #3 and is responsible for their actions as authors of the libelous postings.
23. Additionally, by refusing to provide the Plaintiff with the names of the anonymous defendants, the Defendant WIKIMEDIA has conspired with ANONYMOUS #1, #2, and #3 in libeling the Plaintiff.

25. The article contained, inter alia, the following words:

*Green Party of Canada financier Wayne Crookes filed a suit in which he alleged damages for an online news service that republished resignation letters from that party and let users summarize claims they contained. He had demanded access to all the anonymous sources confirming the insider information, which Geist believed would be extremely prejudicial to online journalism. The lawsuit, "Crookes versus openpolitics", attracted attention from the BBC and major newspapers, perhaps because of its humorous name. Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies.*

(referred to as the "Online Journalism article")

26. The Online Journalism article hyperlinked to the Wayne Crookes article referred to above.

27. The Online Journalism article and its incorporation of the Wayne Crookes article by hyperlink libel the Plaintiff. The words in their natural and ordinary meaning, as well as in their context and in popular innuendo were intended to and understood to mean that the Plaintiff was dishonest and abused power and were intended to lower the Plaintiff's reputation and to expose the Plaintiff to ridicule and contempt.

28. As a result of being the author of the Online Journalism article, including the hyperlink, the Defendant ANONYMOUS #4 libeled the Plaintiff.

29. As a result of publishing the Online Journalism article and its hyperlink, the Defendant WIKIMEDIA libeled the Plaintiff.

30. The Plaintiff has requested that the Online Journalism article be removed from the website, the article be repudiated, and an apology be posted in its place. The Defendant WIKIMEDIA has refused to do either. This is an aggravation of the libel.

31. The Plaintiff has requested from the Defendant WIKIMEDIA the name of the Defendant ANONYMOUS #4. It has refused. This is an aggravation of the libel.

32. As a result of the refusal to provide the Plaintiff with the name of ANONYMOUS #4, the Defendant WIKIMEDIA has acted as the agent for ANONYMOUS #4 and is responsible for the libelous postings.

33. Additionally, by refusing to provide the Plaintiff with the name of the ANONYMOUS #4, the Defendant WIKIMEDIA has conspired with ANONYMOUS #4 in libeling the Plaintiff.

Wikipedia licensing of libel

34. The Defendant WIKIMEDIA FOUNDATION, INC. sells for profit, the content of its website Wikipedia to many organizations and persons throughout the world through licensing arrangements. These commercial arrangements of the Defendant WIKIMEDIA have resulted in financial profits for the Defendant WIKIMEDIA.

35. The libels referred to in the Wayne Crookes article and the Online Journalism article, published in Wikipedia, have been delivered as part of these commercial arrangements by the Defendant WIKIMEDIA to many licensees and as a result the libels have been published to these licensees. These commercial arrangements have resulted in monies being paid to the Defendant WIKIMEDIA. The particulars of these commercial arrangements are not known to the Plaintiff but will be provided upon discovery.

36. In the mitigation of its liability for its role in the libeling the Plaintiff, WIKIMEDIA failed to direct to its commercial licensees the removal of the libels.

37. Both the libeling of the Plaintiff for profit and the failure to direct the removal of the libels to its commercial licensees has aggravated the libel of the Defendant WIKIMEDIA.

Domains By Proxy Inc: USGovernetics article

38. In or about August 2006, the Wayne Crookes article referred to above appeared on an internet website entitled known as *USGovernetics.com* with a url of http://www.usgovernetics.com/Res-to-Ros/resignation_letters.php/. The website has worldwide circulation on the internet.

39. The website *USGovernetics.com* is owned by ANONYMOUS #5 and as the publisher of the article, ANONYMOUS #5 has libeled the Plaintiff. As a result of the republication of the Wayne Crookes article on the *USGovernetics.com* website, ANONYMOUS #1, 2, and 3 as authors of the article have further libeled the Plaintiff.

40. The Defendant DOMAINS BY PROXY, INC. is the proxy registration service which represents itself as registrant of the website *USGovernetics.com*, allowing the actual owner of the site to maintain its anonymity. As such, it is the agent for the owner ANONYMOUS #5 and responsible for the actions of ANONYMOUS #5. It is also the agent for, and responsible for the actions of the authors ANONYMOUS #1, 2, and 3.

41. The Plaintiff has requested that the Defendant DOMAINS BY PROXY, INC. identify the owner of the website *USGovernetics.com*. The Defendant DOMAINS BY PROXY, INC. has refused. As such, it has accepted the responsibility for the actions of the owner of the website and has conspired with ANONYMOUS #1's through #5 to libel the Plaintiff and has aggravated the libel.

42. The Plaintiff requested an apology and a repudiation of the libel. The Defendant DOMAINS BY PROXY, INC. refused. This is an aggravation of the libel.

Domains by Proxy, Inc.: Theramonitor article

43. At some time in 2006, the Wayne Crookes article referred to above appeared on an internet web site entitled *Theramonitor.com* with a url of http://www.theramonitor.com/resignation_letters.php. The website has worldwide circulation on the internet.

44. The website *Theramonitor.com* is owned by ANONYMOUS #6 and as the publisher of the article, ANONYMOUS #6 has libeled the Plaintiff. As a result of the republication of the *Wayne Crookes* article on the *Theramonitor.com* website, its authors ANONYMOUS #1, 2, and 3 have further libeled the Plaintiff.

45. The Defendant DOMAINS BY PROXY, INC. is the proxy registration service which represents itself as registrant of the website *Theramonitor.com* allowing the actual owner of the site to maintain its anonymity. As such, it is the agent for the owner ANONYMOUS #6 and responsible for the actions of ANONYMOUS #6. It is also the agent for, and responsible for the actions of the authors ANONYMOUS #1, 2 and 3.

46. The Plaintiff has requested of the Defendant DOMAINS BY PROXY, INC. that it remove the *Wayne Crookes* article from the *Theramonitor.com* website. The Defendant DOMAINS BY PROXY, INC. has caused this to happen.

47. The Plaintiff has requested that the Defendant DOMAINS BY PROXY, INC. identify the owner of the website *Theramonitor.com*. The Defendant DOMAINS BY PROXY, INC. has refused. As such, it has accepted the responsibility for the actions of the owner of the website and has conspired with the owner and the author to libel the Plaintiff. This is an aggravation of the libel.

48. The Plaintiff has requested that the Defendant DOMAINS BY PROXY, INC. apologize on behalf of itself and the owner of the website *Theramonitor.com* for the libel and to repudiate it publicly. It has refused. This is an aggravation of the libel.

P2pnet.net

49. On or about July 18, 2006, an article entitled "Free Speech in Canada" written by the Defendant JON NEWTON was posted on the website www.P2Pnet.net, a website owned by the Defendant JON NEWTON with a url of www.p2pnet.net/story/9387. The website has worldwide circulation on the internet.

50. The article contained *inter alia* the following words:

I've just met Michael Pilling, who runs OpenPolitics.ca. Based in Toronto, he, too is being sued or defamation. This time by politician Wayne Crookes.

51. The words OpenPolitics.ca in the "Free Speech in Canada" article were hyperlinked to the a website with a url of <http://www.OpenPolitics.ca> which has world wide circulation and which website contains the following statements:

a. **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

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".

c. **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.

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 (sic) 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 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 than 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

- o *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.

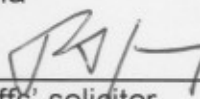
(all of the words set out in this Paragraph are known collectively as the "OpenPolitics words")

52. The words "Wayne Crookes" in the "Free Speech in Canada" article were hyperlinked to the *Wayne Crookes* article which was posted on the website

- b. General, special and punitive damages against each of the Defendants by the Corporate Plaintiff;
- c. An order requiring each of the Defendants to provide to the Plaintiffs, the names and contact information within their knowledge or control of the anonymous persons who have libeled the Plaintiffs;
- e. An order removing the libelous words from the offending websites;
- f. 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: April 16 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