



S-072591

NO
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

Between:

WAYNE CROOKES and
WEST COAST TITLE SEARCH LTD.

Plaintiffs

And:

GOOGLE INC., and
ANONYMOUS #1 through #6

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)

GOOGLE INC.,
1600 Amphitheatre Parkway, Mountain View,
California, United States of America

ANONYMOUS #1 through #6
Addresses presently unknown

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 GOOGLE INC., ANONYMOUS #1 through #6

16APR07 712391
21422 5072591

R155

208.00

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

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: 13 April 2007



Solicitor for the Plaintiffs

NO
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

Between:

WAYNE CROOKES and
WEST COAST TITLE SEARCH LTD.

Plaintiffs

And:

GOOGLE INC., ANONYMOUS #1 through #6

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.
3. The Defendant GOOGLE INC. ("GOOGLE") is an incorporated body with a place of business and address for service of 1600 Amphitheatre Parkway, Mountain View, California, United States of America. It is the internet host site for a blog service entitled blogspot.com which has universal access and world wide distribution on the internet.

4. The Defendants ANONYMOUS #1 through #5 are authors whose identities and addresses are unknown. ANONYMOUS #6 is the owner of a blogsite on the blog service hosted by GOOGLE. The blogsite is entitled The Green Compost Heap and has a url of <http://greencompostheap.blogspot.com>.

Blow it out your tailpipe

5. On or about August 7, 2006, ANONYMOUS #1 posted an article on the blogsite The Green Compost Heap entitled "Blow it out your tailpipe" which had a url of <http://greencompostheap.blogspot.com/2006/08/blow-it-out-your-tailpipe.html>

6. The article contained the following words:

Blow it out your tailpipe

The humans tending my compost heap gave the pile a turn today, and look what came up!

Dear Ms. Johansson, Ms. Holloway and Mr. White:

I am writing to you in your capacities as moderators/administrators of gpc-members@yahoo.com.

I would ask you to please review message #6253. For your convenience, a copy of the offending post follows this message. In my mind it is clearly vulgar, disrespectful, and I submit libelous. I hope you will agree with me that it is not the type of message that falls within the standards of dialogue you want for this site. I trust you will agree we all benefit when people communicate politely and are respectful of other people and their reputations.

I request as moderators/administrators that you remove post #6253 immediately.

I also request that someone post an apology for it, preferably from the author, which meets the requirements of the libel laws of Canada ; that is an apology that is complete, full and unconditional. If the author is not prepared to apology I request you advise me whether there will be any consequences for him.

Like you I strongly believe in freedom of speech and the Canada Charter of Rights and this is one of the many reasons for my strong support of the Green Party. With free speech comes the responsibility to not recklessly or maliciously damage reputations. The Charter, of course, does not give people a licence to libel.

Very truly yours,

Wayne Crookes

Oh my! I am having a wormy shiver! I am just a little tube! What was the horrible thing that was said? Oh:

Crookes threatened PEP once and we advised him, in legal terms, to blow it out his tailpipe. Apparently he did. All you have to do is say "Bring it on! We're ready!" and he'll back down.

I know that I am just a little worm, but how can this be libel? If I thought it was, I would not publish it. Of course, I am unclear as to what a tailpipe is, and how one can blow a threat through it, but the trolls tell me that this is something called a "UPHOMISM". So people blow things through their uphomisms? I am just a little worm, I understand none of this. Perhaps it is made of tubes?

If Mr. Crookes wishes to argue differently here, I would be more than pleased to issue an apology, nematode to nematode.

(referred to as the "*Blow it out your tailpipe*" article)

7. The "Blow-it-out-your-tailpipe" 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 lower the Plaintiff's reputation and expose the Plaintiff to ridicule and contempt.

8. As a result of authoring the "*Blow it out your tailpipe*" article, ANONYMOUS #1 has libeled the Plaintiff.

Liars, Morons and Crookes

9. On or about August 7, 2006, ANONYMOUS #2 posted a comment on the blogsite The Green Compost Heap commenting on the article "*Impartial*" elections committee member donated to David Chernushenko!!! which had a url of <http://greencompostheap.blogspot.com/2006/08/impartial-elections-committee-member.html>

10. The posting contained the following words:

Chernubunko certainly has the worst people in the GPC in his camp: Debbie Hartley is THE worst, but Wayne Crookes, Jim Harris, Dermot Travis, Markus Bucharth and Kevin Colton certainly are in that race to destroy whatever is left of "green values" in the GPC. And all of them back Chernubunko....

He and his faction really need to be flushed now, for the credibility of the entire Green movement. There's no unity with shameless liars, plain morons, and those crookes who can't follow even their own twisted rules.

(the "*liars, morons and crookes*" posting)

11. The *liars, morons and crookes* posting in its natural and ordinary meaning, as well as in its context and in popular innuendo was intended to and understood to lower the Plaintiff's reputation and expose the Plaintiff to ridicule and contempt. Further, it was

intended to mean, and understood to mean that the Plaintiff is dishonest, stupid, contemptible and not deserving of respect.

12. As a result of authoring the *liars, morons, and crookes* posting, ANONYMOUS #2 has libeled the Plaintiff.

Google these cronies

13. On or about September 4, 2006, ANONYMOUS #3 posted a comment on the blogsite The Green Compost Heap commenting on the article *Senior Party Strategist* which had a url of <http://greencompostheap.blogspot.com/2006/09/senior-party-strategist.html>.

14. The posting contained, inter alia, the following words:

Go google these cronies like Debbie Hartley and Wayne Crookes...---you'll find out a lot about them and their behaviour. There's a good reason why these people aren't open or accountable: they'd self-destruct into a puddle of lies and evasions that contradict each other.

The more anyone brings all this stuff together, like the openpolitics.ca coverage of the bunker and crisis, the more they get attached by that mob.

Or, should one say, that gang of Crookes.

(the "*Google these cronies*" posting)

15. The posting was hyperlinked to the website www.openpolitics.ca which contains the following statements, all of which libel the Plaintiff and the Corporate Plaintiff:

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 derided, 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

- *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")

16. The *Google these cronies* posting and its hyperlinks in their natural and ordinary meaning, as well as in its context and in popular innuendo was intended to and understood to lower the Plaintiffs' reputation and to expose the Plaintiff and the Corporate Plaintiff to ridicule and contempt. Further, it was intended to mean, and understood to mean that the Plaintiff is dishonest.

17. As a result of authoring the *Google these cronies* posting, ANONYMOUS #3 has libeled the Plaintiffs.

Who could this be?

18. On or about August 31, 2006, ANONYMOUS #4 posted an article on the blogsite The Green Compost Heap entitled *Who could this be?* which had a url of <http://greencompostheap.blogspot.com/2006/08/who-could-this-be.html>.

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

A forwarded e-mail has been making the rounds, so say the trolls who live beneath my compost heap. Apparently, there is some administration difficulties being caused by someone who just cannot let go:

We are also dealing with the fact that a certain person in the GPC who has no official position or job is doing everything he possibly can to stifle and control everyone. In the last week he has refused to acknowledge my existence, literally not even allowing himself to make eye contact when face to face a foot apart. It is really weird! The only way I can make the dots connect is if he is working in the interests of another party! I think he's an infiltrator who is trying to prevent the GPC from ever making progress. No one else I've explained the situation too can come up with any other explanation.

Maybe someone will be adding a whole body to my compost heap soon?

20. In response to the posting, ANONYMOUS#5 posted a comment, which said the following:

How about a nice press release like this one being issued about that guy?

And some other crookes, too.

21. like this was hyperlinked to an article entitled "Alfonso Gagliano is not a member of the Liberal Party of Canada" with a url:

http://www.liberal.ca/news_e.aspx?type=news&id=11921

22. some other crookes was hyperlinked to an article posted on Wikipedia entitled *Wayne Crookes* with a url of: http://en.wikipedia.org/wiki/Wayne_Crookes .

23. This 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")

24. The *Who could this be?* article and posting, with the hyperlinks in their natural and ordinary meaning, as well as in its context and in popular innuendo was intended to and understood to lower the Plaintiff's reputation and to expose the Plaintiff to ridicule and contempt. Further, it was intended to mean, and understood to mean that the Plaintiff is dishonest and deserving of no respect.

25. As a result of authoring the *Google these cronies* article and posting, ANONYMOUS #4 and ANONYMOUS #5 have libeled the Plaintiff,

26. As a result of being the owner of The Green Compost Heap blogsite and consequently the publisher of the article and words referred to, ANONYMOUS #6 has libeled the Plaintiff and the Corporate Plaintiff.

GOOGLE INC.

27. GOOGLE is the owner of blogspot.com and has the ability to control the content and distribution of the blogsites contained in it. GOOGLE also has the ability to remove blogsites and cancel blogsites. Further, GOOGLE knows the identity of owners of blogsites on blogspot.com

28. Beginning in August 2006 and ongoing, the Plaintiff has requested that the Defendant GOOGLE remove the referenced articles and postings from the blogsite, shut the blogsite down, and provide the Plaintiff with the identify of the owner of the blogsite and the names of the authors of the referenced articles. GOOGLE has refused, thereby aggravating the libel.

29. Beginning in August 2006, the Plaintiff has also requested an apology for the libels and a repudiation of the libels. GOOGLE has refused, thereby aggravating the libel.

30. The blogsite has remained available worldwide on the internet. The identity of the owner of the blogsite and the identities of the authors remain protected by GOOGLE.

31. Upon becoming aware of the libelous material, and refusing to remove it, GOOGLE has become a publisher of the material and as a result, GOOGLE has libeled the Plaintiff.

32. Further, an article entitled "Gang of Crookes" has been posted on the internet. The words in the original article Gang of Crookes which appeared on the website www.Openpolitics.ca are the following:

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....

(known as the "Gang of Crookes article")

33. The words friends of Crookes in the Gang of Crookes article hyperlink to an article entitled "Friends of Crookes" which says, inter alia, the following:

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".

34. The *Friends of Crookes* article libels the Plaintiff.
35. The Wayne Crookes words in the *Gang of Crookes* article hyperlink to an article entitled "Wayne Crookes" which says, inter alia, the following:

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

36. The author of the articles "Gang of Crookes", "Friends of Crookes" and "Wayne Crookes", together with the publishers of the website www.Openpolitics.ca on which they appear are the Defendants in a separate legal action commenced in the Supreme Court of British Columbia, Vancouver Registry Action S063287.

37. The phrase "Gang of Crookes", and articles relating to the subject, and all referring to the Plaintiffs, through the malicious actions of certain known and unknown individuals, has been published directly, or through hyperlinks on many websites.

38. GOOGLE is the owner of the world's foremost and most used internet search engine. This search engine provides rapid identification of, and hyperlinking of articles after a keyword search (known as "googling"). Upon googling the phrase "Gang of Crookes", the search engine produces many hits, all of which refer to the Plaintiff and all of which libel the Plaintiff. As of March 1, 2007, a google of the phrase "Gang of Crookes" produced 47 hits. Because of the large number of hits, and the length of the articles googled, and because they are all hyperlinked, a summary of the search, including url's is attached as **Schedule A** to this Statement of Claim.

39. The Plaintiff has requested that GOOGLE act to block the identification and retrieval of the "Gang of Crookes" sites from its search engine.

40. GOOGLE has refused to block the retrieval of these hits from the search engine and as a result, has become a publisher of the comments contained in the hits which identify the "Gang of Crookes" sites.

41. The libel 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.

42. As a result of being libeled by ANONYMOUS #1 through #6 as alleged, the continuing libel, the refusal of GOOGLE to remove the libel, block the blogsites, identify the authors of the libel or identify the owners of the blogsite, or block retrieval from the search engine as alleged, the Plaintiffs have suffered damages, including special, aggravated, and punitive damages.

The Plaintiff claims as follows:

a. General, special, aggravated, and punitive damages;

- b. An order requiring the Defendant GOOGLE to provide to the Plaintiffs, the names and contact information within its knowledge or control of the anonymous persons who have libeled the Plaintiff;
- c. An order removing the libelous words from the offending websites or removing the websites from their blogsite;
- d. An order requiring GOOGLE to block the distribution of the libelous material on its blogsite;
- e. An order enjoining GOOGLE from publishing further libel on blogspot.com or any related sites;
- f. An order directing GOOGLE to stop providing search results to internet searchers which contain the words "Gang of Crookes" and a further order that this mandatory order be appropriately monitored.
- g. Further relief as requested;
- h. Costs pursuant to Rule 57 of the Rules of Court.

Place of Trial: Vancouver, British Columbia

Dated: April 13 2007



Plaintiff's 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

①

Schedule A

wcrookes@telus.net | [Search History](#) | [My Account](#) | [Sign out](#)

[Google](#) [Web](#) [Images](#) [Groups](#) [News](#) [Maps](#) [more »](#)

[Advanced Search](#)
[Preferences](#)

Search: the web pages from Canada

Web Personalized Results 1 - 47 of 47 for "**gang of crookes**". (0.40 seconds)

[OpenPolitics.ca : Gang of Crookes](#)

Gang of Crookes. Please login. Login. Username:. Password:. Remember me. Register now · Lost password? Go back · Return to home page. Login. Username: ...
[openpolitics.ca/GPC+Management+Committee](#) - 17k - [Cached](#) - [Similar pages](#)

[OpenPolitics.ca : next GPC Constitution - 2 visits - 11 Feb](#)

Gang of Crookes and conflict of interest. Ongoing recourses and measures to correct problems. GPC Ombuds failed, in the case of suspension of elected ...
[openpolitics.ca/next+GPC+constitution?PHPSESSID=c0e6ee407c6e9b925649ff31b0862549](#) - 52k - [Cached](#) - [Similar pages](#)

[OpenPolitics.ca : GPC council crisis](#)

These were apparently being resisted by Wayne Crookes and Debbie Hartley, and the "**gang of Crookes**" which had controlled the party under the names "ERCT" ...
[openpolitics.ca/GPC+Council+Crisis?PHPSESSID=28087edfc2bed85b325395262ba4f696](#) - 105k - [Cached](#) - [Similar pages](#)

[OpenPolitics.ca : GPC officer](#)

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 ...
[openpolitics.ca/GPC+officer?PHPSESSID=a9a90730dd1f26d584c50172e7fe25b5](#) - 25k - [Cached](#) - [Similar pages](#)

[OpenPolitics.ca : GPC Revenue Sharing Committee](#)

This was one of many abuses and deliberate disenfranchisements of all those members who opposed the **Gang of Crookes**. Some GPC resignation letters, ...
[openpolitics.ca/GPC+Revenue+Sharing+Committee?PHPSESSID=9243fcfce4612c01934f20ebbfcc061](#) -

30k - [Cached](#) - [Similar pages](#)

OpenPolitics.ca : GPC Chief Agent

... Kathryn Holloway the Fundraising Chair was libelled and then 'suspended' in an attempt by the **Gang of Crookes** to muzzle criticism. ...
openpolitics.ca/GPC+Chief+Agent?PHPSESSID=d2fec427d70ebdd8b32a0bac4260c4bf - 27k - [Cached](#) - [Similar pages](#)

OpenPolitics.ca : war room - 2 visits - 11 Feb

... began when the ERCT was removed, but has been slow due to a **Gang of Crookes** impeding progress and requiring centralization of funds in their own hands. ...
openpolitics.ca/war+room?PHPSESSID=fd8e3b2bf6ddda6ffd385a195589eaf5 - 33k - [Cached](#) - [Similar pages](#)

OpenPolitics.ca : term:Gang of Crookes

term:**Gang of Crookes**. Please login. Login. Username:. Password:. Remember me. Register now Lost password? Go back Return to home page. Login. Username: ...
openpolitics.ca/term:Gang+of+Crookes?PHPSESSID=36d538d9c94f485168a60bc23080bc30 - 17k - Supplemental Result - [Cached](#) - [Similar pages](#)

OpenPolitics.ca : Green Party of Canada Living Agenda

It seems therefore that the GPC-LA is simply a means by which a **Gang of Crookes** identifies enemies: luring them into declaring themselves, then purging them ...
openpolitics.ca/Green+Party+of+Canada+Living+Agenda?PHPSESSID=86f7b040d0154bd9d28a2603602696ec - 23k - [Cached](#) - [Similar pages](#)

OpenPolitics.ca : open politics service

In which case, anything goes, see **Gang of Crookes** for an example of people who earned the right to be dealt with to the absolute limit of what the law will ...
openpolitics.ca/open+politics+service?PHPSESSID=867607a05d1fa1bb13d90a00f0097e8e - 49k - [Cached](#) - [Similar pages](#)

Online journalism - Wikipedia, the free encyclopedia - 5 visits - 11 Feb

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
en.wikipedia.org/wiki/Online_journalism - 32k - [Cached](#) - [Similar pages](#)

Reference.com/Encyclopedia/Online journalism - 11 Feb

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
reference.com/browse/wiki/Online_Journalism - 20k - [Cached](#) - [Similar pages](#)

online journalism: Information from Answers.com

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
www.answers.com/topic/online-journalism - 52k - [Cached](#) - [Similar pages](#)

Michael Geist - We Are All Journalists Now - 7 visits - 30 Jan

... and that the absolute hierarchy upheld by Mr. Crookes and friends (the so-called \"**gang of Crookes**\") resembled a mafia organization with a code of ...
www.michaelgeist.ca/content/view/1283/135/ - 93k - [Cached](#) - [Similar pages](#)

Michael Geist - We Are All Journalists Now - 30 Jan

... and that the absolute hierarchy upheld by Mr. Crookes and friends (the so-called \"**gang of Crookes**\") resembled a mafia organization with a code of ...
www.michaelgeist.ca/content/view/1283/1/ - 91k - [Cached](#) - [Similar pages](#)

Michael Geist - We Are All Journalists Now

Crookes and friends (the so-called \"**gang of Crookes**\") resembled a mafia organization with a code of silence and no due process and no engagement other ...
michaelgeist.ca/component/option,com_content/task,view/id,1283/Itemid,70/nsub,/ - 93k - Supplemental Result - [Cached](#) - [Similar pages](#)

Michael Geist - We Are All Journalists Now - 2 visits - 07/12/06

Crookes and friends (the so-called \"**gang of Crookes**\") resembled a mafia organization with a code of silence and no due process and no engagement other ...
michaelgeist.ca/component/option,com_content/task,view/id,1283/Itemid,70/ - 93k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online Journalism Encyclopedia Information @ BlogEntries.com (Blog ...

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. ...
www.blogentries.com/encyclopedia/Online_journalism/ - 41k - [Cached](#) - [Similar pages](#)

Online journalism - Wikipedia, the free encyclopedia

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
www.noproxy.us/index.php?q=aHR0cDovL2VuLndpa2lwZWVpYS5vcmcvd2lraS9PbmxpbmVfam91cm5hbGlzbQ%3D%3E - 42k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism at AllExperts

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
en.allexperts.com/e/o/on/online_journalism.htm - 27k - [Cached](#) - [Similar pages](#)

Online journalism Information and Facts

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
www.mbceo.com/reference/more_information.php?c=Online_journalism - 26k - [Cached](#) - [Similar pages](#)

Travel Guide - Online Reservation - Warsaw Accommodation

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
www.warsaw-hotel.info/poland-guide/Online_journalism - 34k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism - Netencyclo, l'encyclopédie française : Online ...

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
www.netencyclo.com/en/Online_journalism - 35k - [Cached](#) - [Similar pages](#)

Britain.tv Wikipedia - Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
britain.tv/wikipedia.php?title=Online_journalism - 40k - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
libraryoflibrary.com/E_n_c_p_d_Online_journalism.html - 51k - [Cached](#) - [Similar pages](#)

Blog News | Website Listings | Blog Blogs | Classifieds | Blog ...

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
newyorkny.blogsiworld.com/wiki-Online_journalism - 48k - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
www.brainyencyclopedia.com/encyclopedia/o/on/online_journalism.html - 23k - [Cached](#) - [Similar pages](#)

Wayne Crookes - Encyclopedia, History, Geography and Biography

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 ...
www.arikah.com/encyclopedia/Wayne_Crookes - 18k - Supplemental Result - [Cached](#) - [Similar pages](#)

Memorial News | Website Listings | Memorial Blogs | Classifieds ...

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
florida-us.memorialsworld.com/wiki-Online_journalism - 48k - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
www.radiofreeithaca.net/search/Online_journalism - 30k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism - Encyclopedia, History, Geography and Biography

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...
www.arikah.net/encyclopedia/Online_journalism - 17k - Supplemental Result - [Cached](#) - [Similar pages](#)

Omnipelagos.com ~ article "Online journalism"

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

www.omnipelagos.com/entry?n=online_journalism - 14k - Supplemental Result - [Cached](#) - [Similar pages](#)

Wikipedia: Online journalism - Wikipedia, the free encyclopedia

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

en.pediatrix.org/Online_journalism - 38k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism - 2 visits - 11 Feb

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

encycl.opentopia.com/term/Online_journalism - 21k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism - WikiLeasing.com

Crookes had also objected to satire published on the site, including use of the name '**gang of Crookes**' for his allies. Some experts including Mike Godwin ...

www.wikileasing.com/20/Online_journalism.html - 13k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

www.katrinapetsneedhelp.com/pets/Online_journalism - 29k - Supplemental Result - [Cached](#) - [Similar pages](#)

Gatorsports.com :: 100 years of Gator Football

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

gs-gatorsedit.us.publicus.com/apps/pbcs.dll/section?template=wiki&text=Online_Journalism - 37k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

pedia.counsellingresource.com/openpedia/Online_journalism - 26k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

www.anime.co.za/wiki/Online_journalism - 22k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism - Cassiopedia, The True Encyclopedia

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

www.cassiopedia.org/wiki/index.php?title=Online_journalism - 31k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

www.jgames.co.uk/title/Online_journalism - 26k - Supplemental Result - [Cached](#) - [Similar pages](#)

Wikipedia search result - 6 Feb

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

allrss.com/wikipedia.php?title=Online_journalism - 24k - Supplemental Result - [Cached](#) - [Similar pages](#)

resignation letters super page - letters of resignation - 2 visits - 19/12/06

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 ...

www.theramonitor.com/resignation_letters.php - 28k - Supplemental Result - [Cached](#) - [Similar pages](#)

Australian Information from Wikipedia

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

www.thinkingaustralia.com/thinking_australia/wikipedia/default.php?title=Online_journalism - 30k - Supplemental Result - [Cached](#) - [Similar pages](#)

Toronto Catalog

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

www.torontopost.biz/Info/?Online_journalism - 41k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...



sex.knowledgegiant.com/search/Online_journalism - 28k - Supplemental Result - [Cached](#) - [Similar pages](#)

Online journalism

Crookes had also objected to satire published on the site, including use of the name **gang of Crookes** for his allies. Some experts including Mike Godwin ...

medlibrary.org/medwiki/Online_journalism - 30k - Supplemental Result - [Cached](#) - [Similar pages](#)

[Search within results](#) | [Language Tools](#) | [Search Tips](#) | [Dissatisfied?](#) [Help us improve](#)

[Google Home](#) - [Advertising Programs](#) - [Business Solutions](#) - [About Google](#)

©2007 Google