



Further amended with leave of the Court, granted October 22, 2024
Originally filed on Jan 8, 2024 and amended on Mar 22, 2024

FORM 1
(RULE 3-1 (1))

No. S-240157
Vancouver Registry

In the Supreme Court of British Columbia

Between

Masood Masjoody

Plaintiff

and

Reza Pahlavi, X Corp., John Doe 1, John Doe 2, John Doe 3, John Doe 4, John Doe 5, John
Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, John Doe 11, Arash
Kamancheh, Maryam Lagertha, Sedigheh Minachi, Azar Khorramshahi

Defendants

FURTHER AMENDED NOTICE OF CIVIL CLAIM

This action has been started by the plaintiff(s) for the relief set out in Part 2 below.

If you intend to respond to this action, you or your lawyer must

(a) file a response to civil claim in Form 2 in the above-named registry of this court
within the time for

response to civil claim described below, and

(b) serve a copy of the filed response to civil claim on the plaintiff.

If you intend to make a counterclaim, you or your lawyer must

(a) file a response to civil claim in Form 2 and a counterclaim in Form 3 in the above-
named registry of

this court within the time for response to civil claim described below, and

(b) serve a copy of the filed response to civil claim and counterclaim on the plaintiff and
on any new

parties named in the counterclaim.

**JUDGMENT MAY BE PRONOUNCED AGAINST YOU IF YOU FAIL to file the response
to civil claim within the time for response to civil claim described below.**

Time for response to civil claim

A response to civil claim must be filed and served on the plaintiff(s),

(a) if you were served with the notice of civil claim anywhere in Canada, within 21 days
after that service

(b) if you were served with the notice of civil claim anywhere in the United States of
America, within 35

days after that service,

- (c) if you were served with the notice of civil claim anywhere else, within 49 days after that service, or
- (d) if the time for response to civil claim has been set by order of the court, within that time.

ENDORSEMENT ON ORIGINATING PLEADING FOR SERVICE OUTSIDE BRITISH COLUMBIA

The plaintiff, **Masood Masjoody** claims the right to serve the Notice of Civil Claim on the defendants:

Reza Pahlavi, X Corp., John Doe 1, John Doe 2, John Doe 3, John Doe 4, John Doe 5, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, and John Doe 11 outside British Columbia on the grounds that it:

- (a) concerns a tort committed in British Columbia; and
- (b) contains a claim for an injunction ordering a party to do or refrain from doing anything in British Columbia and globally.

CLAIM OF THE PLAINTIFF

Part 1: STATEMENT OF FACTS

A: Parties

1. The plaintiff **Dr. Masood Masjoody** is resident of British Columbia, a veteran pro-democracy Iranian activist and dissident of the Islamist regime ruling Iran, which regime is officially known as the **Islamic Republic of Iran** (the "**Regime**") and listed as a foreign state supporter of terrorism in Canada. The plaintiff has been the vice president of the **Council of Iranian Canadians** ("**CIC**"), and is an independent mathematician. Since 2019 in the latest spell of his political activities, the plaintiff has been principally focused on identifying and exposing agents and enablers of the Regime acting in Canada.

2. The defendant **Reza Pahlavi** ("*Pahlavi*") is the former Crown Prince of the last monarchy in Iran which ruled Iran until 1979. He maintains an active public presence through official social media accounts, including **@PahlaviReza** on **X** (formerly **Twitter**). He also publishes social media content through his affiliated social media accounts, reflecting and aligned with his official messaging, public statements, online campaigns, and political agenda.
3. The defendant **Reza Pahlavi** is affiliated with the following accounts on **X** (formerly **Twitter**): **@Kasrakarimi3**, **@Enghelab22**, **@adam_hesabi**, **@adam_hesabi1**, **@YaarDabestaani**, **@SmalBoy22**, **@Aryammehr2** (also named **@Aryammehr_2**), **@iranianpappppi3**, **@RealPersianGod**, **@sepidehia** (also named **@sepiedhia**), **@atheistcyrus**, **@SunLight__White**, **@YasiPatriot**, **@ArashKamancheh7**, **@Maryam_Lagertha**, **@SedighehMinachi** and **@azarkhorramsha1** (the "Pahlavi-Affiliated Accounts").
4. The defendant **Reza Pahlavi** is also affiliated with the Vancouver-based group **Mission for my Motherland** ("the Mission") and its channels on social media including its public channel on **Telegram** (the "Mission Channel").
5. The Pahlavi-Affiliated Accounts and the Mission Channel consistently publish content mirroring **Reza Pahlavi**'s public statements, policy positions, and political agenda. These accounts and the Mission Channel participate in orchestrated online campaigns and engage in simultaneous postings synchronized with **Reza Pahlavi**'s official communications and public engagements
6. The defendant **Reza Pahlavi**, through the Pahlavi-Affiliated Accounts and the Mission Channel, has published defamatory and harassing content targeting the plaintiff, disseminating all such content to the world at large and contributing to reputational harm and distress.
7. The defendant, **X Corp.**, is a corporation that owns and operates the social media publishing platform **X** (formerly known as **Twitter**). **X Corp.** disseminates content on **X** globally and exercises editorial control by actively promoting, demoting, or removing material, thereby controlling the reach of its publications. Moreover, at all material times, **X Corp.**'s algorithms further amplified content when it received "likes" from

users, effectively republishing such content to a broader audience. Operators of **X** accounts were generally aware that their "likes" could enhance the visibility of content.

8. **X Corp.** functions as a publisher rather than a mere intermediary.
9. The defendant **X Corp.** has published defamatory content as well as harassing content concerning the plaintiff on **X** and elsewhere on the Internet, distributing these contents to a worldwide audience and causing reputational harm, distress, and threats. Despite numerous requests and reports from the plaintiff, **X Corp.** has refused to remove these defamatory and harassing publications.
10. The defendant **John Doe 1**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@Kasrakarimi3**, which has over 19,600 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
11. The defendant **John Doe 2**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@Enghelab22**, which has over 510 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
12. The defendant **John Doe 3**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) accounts **@adam_hesabi**, with more than 22,800 followers, and **@adam_hesabi1**, with more than 4190 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
13. The defendant **John Doe 4**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant

owns and operates the **X** (formerly **Twitter**) account **@YaarDabestaani**, which has over 94,400 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.

14. The defendant **John Doe 5**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@SmalBoy22**, which has over 310 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
15. The defendant **John Doe 6**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@Aryammehr2** (also named **@Aryammehr_2**), which has over 35,100 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
16. The defendant **John Doe 7**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@iranianpappppi3**, which has over 36,400 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
17. The defendant **John Doe 8**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@RealPersianGod**, which has over 214,000 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.

18. The defendant **John Doe 9**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@sepidehia** (also named **@sepiedhia**), which has over 24,200 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
19. The defendant **John Doe 10**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@atheistcyrus**, which has over 11,000 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
20. The defendant **John Doe 11**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. This defendant owns and operates the **X** (formerly **Twitter**) account **@SunLight__White** (also named **@sepiedhia**), which has over 6,510 followers. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
21. The individual **John Doe 12**, whose precise identity is currently unknown to the plaintiff, is an individual affiliated with the defendant **Reza Pahlavi**. **John Doe 12** owns and operates the **X** (formerly **Twitter**) account **@YasiPatriot**, which has over 7,570 followers. Acting both personally and as an agent of **Reza Pahlavi**, **John Doe 12** has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
22. The defendant **Arash Kamancheh** ("**Kamancheh**") is an individual residing in British Columbia and affiliated with the defendant **Reza Pahlavi**. At all material times, **Kamancheh** has been the leader of the group **Mission for my Motherland** (the "**Mission**"), which is affiliated with the defendant **Reza Pahlavi**. **Kamancheh** is the

owner and the operator of the **X** (formerly **Twitter**) account **@ArashKamancheh7**. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.

23. At all material times, **Kamancheh** has been an admin of the Mission Channel exercising authority to add or remove member into and from the Mission Channel and moderate content posted by the members on the Internet through the Mission Channel.

24. The defendant **Maryam Lagertha** ("*Lagertha*") is an individual residing in British Columbia and affiliated with the defendant **Reza Pahlavi**. At all material times, **Lagertha** has been a member the group **Mission for my Motherland** (the "Mission"), which is affiliated with the defendant **Reza Pahlavi**. **Lagertha** is the owner and the operator of the **X** (formerly **Twitter**) account **@Maryam_Lagertha**. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.

25. At all material times, **Lagertha** has been an admin of the Mission Channel exercising authority to add or remove member into and from the Mission Channel and moderate content posted by the members on the Internet through the Mission Channel.

26. The defendant **Sedigheh Minachi** ("*Minachi*") is an individual residing in British Columbia and affiliated with the defendant **Reza Pahlavi**. At all material times,, **Minachi** has been a member the group **Mission for my Motherland** (the "Mission"), which is affiliated with the defendant **Reza Pahlavi**. **Minachi** is the owner and the operator of the **X** (formerly **Twitter**) account **@SedighehMinachi**. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, including unrestricted and publicly accessible content on **Telegram**, disseminating all such content to the world at large.

27. The defendant, **Azar Khorramshahi** ("*Khorramshahi*"), is an individual residing in British Columbia and affiliated with the defendant **Reza Pahlavi**. At all material times,

Khorramshahi has been a member the group **Mission for my Motherland** (the “Mission”), which is affiliated with the defendant **Reza Pahlavi**. **Khorramshahi** is the owner and the operator of the **X** (formerly **Twitter**) account **@azarkhorramsha1**. Acting both personally and as an agent of **Reza Pahlavi**, this defendant has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.

28. The person named, **Sepideh Bahrami** (“*Bahrami*”), is an individual residing in the United States and affiliated with the defendant **Reza Pahlavi**. **Bahrami** operates the **X** (formerly **Twitter**) account **@SunLight__White**. Acting both personally and as an agent of **Reza Pahlavi**, **Bahrami** has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
29. The person named **Seyedehmina Mirazimi** (a.k.a. **Mina Mirazimi**) (“*Mirazimi*”), is an individual residing in the United States and affiliated with the defendant **Reza Pahlavi**. **Bahrami** operates the **X** (formerly **Twitter**) account **@YasiPatriot**. Acting both personally and as an agent of **Reza Pahlavi**, **Mirazimi** has published defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet, disseminating all such content to the world at large.
30. The person named **Shirin Yadegari** (“*Yadegari*”) is an individual residing in British Columbia and affiliated with the defendant **Reza Pahlavi**. At all material times,, **Yadegari** has been a member the group **Mission for my Motherland** (the “Mission”), which is affiliated with the defendant **Reza Pahlavi**. Acting both personally and as an agent of **Reza Pahlavi**, **Yadegari** has republished on the Mission Channel on **Telegram** and elsewhere on the Internet defamatory and harassing content of other defendants concerning the plaintiff, disseminating such content to the world at large.
31. The person named **Mehdi Ahmadzadeh** (“*Ahmadzadeh*”) is an individual residing in British Columbia and has been affiliated with the defendant **Reza Pahlavi** since January 10, 2024. Acting both personally and as an agent of **Reza Pahlavi**, **Ahmadzadeh** has published on the Mission Channel on **X** and elsewhere on the Internet defamatory and harassing content that were republished by other defendants

on **X**, **Telegram**, and elsewhere on the Internet. **Ahmadzadeh** published defamatory content concerning the plaintiff to the world at large.

B. Overview of the Claims and Defamatory Stings

32. The plaintiff claims damages for harm to his reputation, emotional distress, and threats to his personal safety caused by a coordinated and sustained campaign of vilification.
33. The individual defendants, acting in concert with each other and with **X Corp.**, conspired to defame, intimidate, harass, and isolate the plaintiff. This conspiracy included the coordinated publication and amplification of defamatory and harassing content on various platforms, including **X** (formerly **Twitter**), **Telegram**, and elsewhere on the Internet.
34. The defendants' publications were made publicly on **X**, **Telegram**, and other platforms, accessible to anyone with access to the Internet. These publications were amplified by **X Corp.**'s algorithms and engagement mechanisms, which promoted their reach and visibility to a global audience.
35. **X Corp.**, as the owner and operator of **X** (formerly **Twitter**), actively contributed to the publication and amplification of the defamatory and harassing content on **X** by allowing, promoting, and failing to remove the defamatory content despite multiple reports and requests by the plaintiff.
36. **Defamatory Stings.** The defamatory expressions of the defendants, as described in this Notice of Civil Claim, conveyed to the average, ordinary person as a matter of impression one or more of the following false and defamatory imputations concerning the plaintiff:
 - (1) The plaintiff is a beggar (the "Beggar Sting").
 - (2) The plaintiff is a bully (the "Bully Sting").
 - (3) The plaintiff is a bully of domestic animals (the "Animal Bully Sting").
 - (4) The plaintiff is a charlatan (the "Charlatan Sting").

- (5) The plaintiff is a companion of the Islamic Republic's Regime's agents (the "Companion of Regime Agents Sting").
- (6) The plaintiff is a cult member (the "Cult Member Sting").
- (7) The plaintiff is a disgraced individual (the "Disgraced Individual Sting").
- (8) The plaintiff is a harasser (the "Harasser Sting").
- (9) The plaintiff is homeless (the "Homeless Sting").
- (10) The plaintiff is a human trafficker (the "Human Trafficker Sting").
- (11) The plaintiff is a liar (the "Liar Sting").
- (12) The plaintiff is a lobbyist of the Islamic Republic's Regime (the "Regime Lobbyist Sting").
- (13) The plaintiff is a means of revenge against Reza Pahlavi (the "Revenge Tool Against Pahlavi Sting").
- (14) The plaintiff is a member of the Islamic Republic's Regime's Ministry of Intelligence (the "Regime's Ministry of Intelligence Member Sting").
- (15) The plaintiff is a mercenary of the Islamic Republic's Regime (the "Regime Mercenary Sting").
- (16) The plaintiff is a miserable wretch (the "Miserable Wretch Sting").
- (17) The plaintiff is a misogynist (the "Misogynist Sting").
- (18) The plaintiff is a rapist (the "Rapist Sting").
- (19) The plaintiff is a saint for the fake Iranian opposition (the "Fake Opposition Saint Sting").
- (20) The plaintiff is a sexist who does not accept no for an answer (the "Sexist Sting").
- (21) The plaintiff is a sexual abuser (the "Sexual Abuser Sting").
- (22) The plaintiff is a stereotypical sexist who does not understand the boundaries (the "Boundary Violator Sexist Sting").

- (23) The plaintiff is a terrorist (the "Terrorist Sting").
- (24) The plaintiff is a woman abuser (the "Woman Abuser Sting").
- (25) The plaintiff abused the Iranian community in Canada (the "Iranian Community Abuser Sting").
- (26) The plaintiff is an IRGC member (the "IRGC Member Sting"), where the IRGC stands for the Islamic Revolutionary Guard Corps and is a designated terrorist entity in Canada.
- (27) The plaintiff is an MEK member (the "MEK Member Sting"), where MEK stands for Mojahedin-e-Khalq (MEK), also known as The People's Mojahedin Organization of Iran, an organization specifically subject to hatred among the supporters of the defendant, Pahlavi who publicly assert the MEK members deserve to be put to death.
- (28) The plaintiff is associated with the Regime's agents (the "Regime Agents Association Sting").
- (29) The plaintiff is associated with the Regime's Ministry of Intelligence (the "Ministry of Intelligence Association Sting").
- (30) The plaintiff is being paid by the Regime (the "Regime Payments Sting").
- (31) The plaintiff is being used by the fake Iranian opposition to throw dirt against Pahlavi (the "Fake Opposition Tool Sting").
- (32) The plaintiff was continuously sending harassing messages to Amélie Trotignon (the "Harassing Messages to Trotignon Sting").
- (33) The plaintiff is convicted of misogyny (the "Misogyny Conviction Sting").
- (34) The plaintiff is corrupt (the "Corruption Sting").
- (35) The plaintiff is crazy (the "Crazy Sting").
- (36) The plaintiff is deceptively blaming expulsion from the university on the infiltration of IRGC agents (the "University Expulsion Blame Sting").

- (37) The plaintiff defamed three individuals named Trotignon, Mishna, and Kropinski by emailing their employers (the "Defamation of Colleagues Sting").
- (38) The plaintiff is directed by the MEK for a disinformation campaign against Reza Pahlavi and his team (the "MEK Disinformation Campaign Sting").
- (39) The plaintiff disguised himself on a hunger strike (the "Hunger Strike Disguise Sting").
- (40) The plaintiff is dishonest (the "Dishonesty Sting").
- (41) The plaintiff is dishonourable (the "Dishonourable Sting").
- (42) The plaintiff was dismissed from the University for obsession with an international French student (the "University Dismissal for Obsession Sting").
- (43) The plaintiff disrupted the work of monarchists (the "Monarchist Disruption Sting"), where the monarchists is a reference to supporters of Pahlavi.
- (44) The plaintiff is engaging in deceitful and harassing behaviour as a means of seeking revenge (the "Revenge Harassment Sting").
- (45) The plaintiff is ethically dirty (the "Ethical Dirtiness Sting").
- (46) The plaintiff was expelled from SFU for administrative violations (the "SFU Administrative Expulsion Sting").
- (47) The plaintiff was expelled from SFU for ethical violations (the "SFU Ethical Expulsion Sting").
- (48) The plaintiff was expelled from SFU for harassing a colleague (the "SFU Harassment Expulsion Sting").
- (49) The plaintiff was expelled from SFU for harassing Amélie Trotignon (the "SFU Expulsion for Trotignon Harassment Sting").
- (50) The plaintiff was expelled from the university (the "University Expulsion Sting").
- (51) The plaintiff was expelled from the university for harassing and bullying a female colleague (the "Harassment and Bullying Expulsion Sting").

- (52) The plaintiff went on a hunger strike that had no connection with the IRGC issue (the "IRGC-Irrelevant Hunger Strike Sting").
- (53) The plaintiff is greedy (the "Greed Sting").
- (54) The plaintiff had a meeting with Ruhollah Khomeini forces on X (the "Khomeini Forces Meeting Sting"), where Ruhollah Khomeini refers to the first leader of the Regime.
- (55) The plaintiff harassed Amélie Trotignon (the "Trotignon Harassment Sting").
- (56) The plaintiff harassed and bullied a classmate at the university (the "University Bullying Sting").
- (57) The plaintiff harassed several women (the "Multiple Women Harassment Sting").
- (58) The plaintiff had a claim three times addressed and rejected by courts as baseless (the "Addressed and Rejected as Baseless Claims Sting").
- (59) The plaintiff had a completely misogynistic tone against female colleagues and staff (the "Misogynistic Tone Sting").
- (60) The plaintiff had a court order against him for ceasing an online harassment campaign (the "Online Harassment Order Sting").
- (61) The plaintiff had a court ruling against him for harassing several women (the "Court Ruling for Women Harassment Sting").
- (62) The plaintiff has a disinformation campaign against Reza Pahlavi and his team (the "Disinformation Campaign Against Pahlavi Team Sting").
- (63) The plaintiff has a documented and verified case against him for harassing several women (the "Verified Harassment Case Sting").
- (64) The plaintiff has a documented harassment history (the "Harassment History Sting").
- (65) The plaintiff has a history of sexually harassing women (the "Sexual Harassment History Sting").

- (66) The plaintiff has a misogynistic website (the "Misogynistic Website Sting").
- (67) The plaintiff has a troubled immigration claim (the "Troubled Immigration Claim Sting").
- (68) The plaintiff had a baseless court case against female colleagues and SFU (the "Baseless Court Case Sting").
- (69) The plaintiff had an obsessive compulsion towards Amélie Trotignon (the "Obsessive Compulsion Sting").
- (70) The plaintiff made bizarre affidavits, according to a ruling of the BC Court of Appeal (the "Bizarre Affidavits Sting").
- (71) The plaintiff made misogynistic affidavits, according to a ruling of the BC Court of Appeal (the "Misogynistic Affidavits Sting").
- (72) The plaintiff made false claims against anonymous Twitter accounts (the "False Claims Against Twitter Accounts Sting").
- (73) The plaintiff made false claims against Pahlavi (the "False Claims Against Pahlavi Sting").
- (74) The plaintiff made satanic affidavits, according to a ruling of the BC Court of Appeal (the "Satanic Affidavits Sting").
- (75) The plaintiff had his job in the IRGC (the "IRGC Employment Sting").
- (76) The plaintiff has MEK friends at Fara News media organization (the "MEK Friends at Fara News Sting").
- (77) The plaintiff has multiple court rulings against him for abusing and harassing female colleagues (the "Multiple Rulings for Harassment Sting").
- (78) The plaintiff had numerous misogynistic posts on Twitter and Facebook against former colleagues (the "Misogynistic Posts Sting").
- (79) The plaintiff has to sleep next to garbage bins (the "Sleeping by Garbage Sting").

- (80) The plaintiff has various mental illnesses (the "Mental Illness Sting"). **Remark.** In some cases, this accusation is made explicitly or implied through the use of derogatory Persian terms such as "mashang" or "mashangi," which are highly offensive references to a person suffering from mental illness.
- (81) The plaintiff is being referred to as a "Crested Pigeon," which implies that the plaintiff is weak, compromised, or insignificant, and an easy target or victim (the "Crested Pigeon Sting").
- (82) The plaintiff wrote bizarre posts, according to a ruling of the BC Court of Appeal (the "BCCA Bizarre Posts Ruling Sting").
- (83) The plaintiff wrote misogynistic posts, according to a ruling of the BC Court of Appeal (the "BCCA Misogynistic Posts Ruling Sting").
- (84) The plaintiff wrote satanic posts, according to a ruling of the BC Court of Appeal (the "BCCA Satanic Posts Ruling Sting").
- (85) The plaintiff infiltrated the club of monarchists under the guise of a nationalist (the "Monarchist Infiltration Sting").
- (86) The plaintiff lacks a place to sleep (the "Lacking Place to Sleep Sting").
- (87) The plaintiff lied about having a court case related to the influence of the IRGC (the "IRGC Court Case Lie Sting").
- (88) The plaintiff lied about the reason for expulsion from the university (the "Expulsion Lie Sting").
- (89) The plaintiff is not trustworthy (the "Untrustworthiness Sting").
- (90) The plaintiff is on the side of mercenary agents of the Islamic Republic's Regime (the "Regime Mercenary Side Sting").
- (91) The plaintiff is one of the heads of the Islamic Republic's Regime abroad (the "Regime Leader Abroad Sting").
- (92) The plaintiff does not shower at all (the "No Showering Sting").

- (93) The plaintiff has to shower in other people's houses (the "Showering Elsewhere Sting").
- (94) The plaintiff could not afford to shower more than once a month (the "Monthly Shower Sting").
- (95) The plaintiff would rape a woman in a picture (the "Picture Rape Sting").
- (96) The plaintiff paid no attention to Amélie Trotignon's rights (the "Neglecting Trotignon's Rights Sting").
- (97) The plaintiff is part of the Reformist branch of the Islamic Republic's Regime (the "Reformist Branch Sting").
- (98) The plaintiff is relying on funds from the Iranian-American activist Masih Alinejad (the "Funding from Alinejad Sting").
- (99) The plaintiff resembles a dying mosquito (the "Dying Mosquito Sting").
- (100) The plaintiff is selfish (the "Selfish Sting").
- (101) The plaintiff was sent to Canada by the Islamic Republic's Regime (the "Regime's Canada Placement Sting").
- (102) The plaintiff is severely depressed (the "Severe Depression Sting").
- (103) The plaintiff is spreading false accusations against Reza Pahlavi and his associates (the "False Accusations Sting").
- (104) The plaintiff stalked Amélie Trotignon (the "Trotignon Stalking Sting").
- (105) The plaintiff is subverting the monarchists (the "Monarchist Subversion Sting").
- (106) The plaintiff is a Vancouver Cardboard Dweller (the "Cardboard Dweller Sting").
- (107) The plaintiff is a psychopath (the "Psychopath Sting").
- (108) The plaintiff is a misogynistic little man (the "Misogynistic Little Man Sting").
- (109) The plaintiff shares a father or a mother with a child of a mullah (the "Child of a Mullah Sting"), where mullah refer to any Shiite clergyman who is an authority of the Regime.

- (110) The plaintiff is getting deported from Canada (the "Deportation Sting").
- (111) The Canadian government is aware of the plaintiff's collaboration with the organs of the Islamic Republic's Regime (the "Collaboration with Regime Known to Canadian Government Sting").
- (112) The plaintiff's asylum application has been rejected by the Canadian government (the "Asylum Claim Rejection Sting").
- (113) The plaintiff is mentally disturbed (the "Mentally Disturbed Sting").
- (114) The plaintiff is the world's joke (the "World's Joke Sting").
- (115) The plaintiff's mother should come to his village's airport in Iran to receive him (the "Villager Mother Sting").
- (116) The plaintiff is disgraceful (the "Disgraceful Sting").
- (117) The plaintiff received an inadmissibility letter from the IRB (the "IRB Inadmissibility Letter Sting").
- (118) The plaintiff is associated with Iran's dictator, Ali Khamenei (the "Khamenei Association Sting").
- (119) The plaintiff tricked others into supporting his hunger strike (the "Hunger Strike Trick Sting").
- (120) The plaintiff derives sexual pleasure from inserting a Pepsi bottle into his rectum (the "Pepsi Bottle Sting"). **Remark.** This accusation is made explicitly or implied through the use of the derogatory Persian terms "Pepsi-chi," which is a derogatory and highly offensive reference to a gay man who derives sexual pleasure from inserting a Pepsi bottle into his rectum.
- (121) The plaintiff relies for basic life needs on financial support from Shiite institutions and clerics, being a mercenary of Shiite Islamists (the "Shiite Mercenary Sting"). **Remark.** This accusation is sometimes explicit or implied through the derogatory Persian term "gheymeh-khor" and its variations, such as "gheymeh-khory" and "consuming Imam Hossein's gheymeh." These terms

suggest reliance on financial support and food from Shiite institutions and clerics (mullahs), thus implying servitude to Shiite Islamists.

- (122) The plaintiff harasses and bullies citizens, judges, and governments in Canada or the United States (the "Government Harassment Sting").
- (123) The plaintiff has an incurable illness (the "Incurable Illness Sting").
- (124) The plaintiff is a professional sex worker who wears women's clothes at night (the "Sex Worker Sting").
- (125) The plaintiff was premeditatedly sent abroad by the Islamic Republic as a student (the "Premeditated Student Sting").
- (126) The plaintiff was a member of the Islamic Association of Polytechnic University, supporting its activities (the "Islamic Association Membership Sting").
- (127) The plaintiff abuses the court's processes with frivolous complaints and legal actions intended to harass others and waste judicial resources (the "Court Process Abuse Sting").
- (128) The plaintiff files lawsuits as a strategy to remain in Canada, implying a lack of genuine legal claims and abuse of the court system. (the "Lawsuits to Stay in Canada Sting").
- (129) The plaintiff is a professional complainer (the "Professional Complainer Sting").
- (130) The plaintiff is a thug of the Islamic Republic's Regime (the "Regime Thug Sting").
- (131) Despite being a refugee, the plaintiff applied for an Iranian passport (the "Iranian Passport Application Sting").
- (132) The plaintiff is a cave-dwelling MEK cub (the "Cave-Dwelling MEK Cub Sting").
- (133) The plaintiff takes money through lies and extortion (the "Extortion Sting").

- (134) The plaintiff is a psychopathic friend of Vahid Beheshti (the "Psychopathic Friend Sting").
- (135) The plaintiff was hospitalized in a psychiatric hospital (the "Psychiatric Hospitalization Sting").
- (136) The plaintiff is a creature sent on a special mission by Ahmad Jannati, a high-ranking cleric in the Islamic Republic (the "Jannati Mission Sting").
- (137) The plaintiff is associated with high-ranking clerics to evade legal consequences (the "Cleric Association to Evade Legal Consequences Sting")
- (138) The plaintiff is a submissive gay man (the "Submissive Gay Man Sting"). **Remark.** This accusation is sometimes explicit or implied through the derogatory Persian term "googooli," which is a derogatory and highly offensive reference to a submissive gay man who has been sexually abused as a child.
- (139) The plaintiff has been sexually abused as a child (the "Sexually Abused as a Child Sting"). **Remark.** This accusation is sometimes explicit or implied through the derogatory Persian term "googooli," which is a highly offensive reference to a submissive gay man who has been sexually abused as a child.
- (140) The plaintiff is associated with child sexual abusers (the "Child Sexual Abuser Association Sting"). **Remark.** This accusation is sometimes explicit or implied through claiming association with a disgraced child sexual abuser named **Saeed Toosi** (or simply, "Toosi"), who is a prominent Qur'an reciter and teacher closely affiliated with the Regime's leader, Ali Khamenei.
- (141) The plaintiff is intensifying crimes by slandering and harassing opponents of the Regime, leading to inevitable legal consequences (the "Crimes Intensification Sting")
- (142) The plaintiff is associated with high-ranking leaders of the Islamic Republic's Regime and/or is allowed to use their facilities, such as helicopters, implying collaboration or alignment with the regime's leadership and activities (the "Regime Leaders' Association Sting")

- (143) The plaintiff deceives others by creating fictitious and manipulative stories (the "Manipulative Sting").
- (144) The "Farty Insult Sting". The plaintiff is demeaned and insulted by being referred to with a mocking and derogatory nickname (the "Farty Insult Sting").
- (145) The plaintiff is associated with or supports foreign government interference in domestic affairs ("Foreign Interference Sting").
- (146) The plaintiff has been convicted in court for sexual harassment (the "Sexual Harassment Conviction Sting").
- (147) The plaintiff has initiated multiple baseless complaints to target political activists and others, causing unnecessary legal and reputational harm (the "Baseless Complaints Sting").
- (148) The plaintiff fabricates evidence for malicious purposes to mislead the court and public opinion (the "Fabricated Evidence Sting").
- (149) The plaintiff uses manipulated or fabricated voice recordings to impersonate others or create false narratives, undermining trust and damaging reputations (the "Voice Manipulation Sting").
- (150) The plaintiff exploits political struggles and deception for personal gain, power, or wealth after the fall of the Islamic Republic (the "Political Opportunism Sting").
- (151) The plaintiff is a sympathizer of the MEK and collaborates with or supports its activities (the "MEK Sympathizer Sting").
- (152) The plaintiff collaborates with an organized cyber team to spread false information, harass others, or manipulate public perception (the "Cyber Team Collaboration Sting")
- (153) The plaintiff deserves to be put to death (the "Deserves Death Sting").
- (154) The plaintiff is beyond redemption and deserving of punishment (the "Beyond Redemption Sting").

- (155) The plaintiff's actions necessitate creating teams for bodily harm and assassination (the "Team for Bodily Harm and Assassination Sting").
- (156) The plaintiff deserves extrajudicial assassination for his actions (the "Extrajudicial Assassination Sting").
- (157) The plaintiff is schizophrenic (the "Schizophrenic Sting").
- (158) The plaintiff is a drug addict or is dependent on illegal substances (the "Drug Addiction Sting").

C. Civil Conspiracy

Predominant Purpose Conspiracy

- 37. Between approximately December 24, 2023, and continuing to at least May 23, 2024, the defendant **Reza Pahlavi**, acting personally and through his affiliates, and the remaining individual defendants, acting in concert with each other and with **X Corp.**, conspired with the predominant purpose of causing harm to the plaintiff.
- 38. The predominant purpose of the defendants' conspiracy was to vilify, intimidate, silence, and undermine the plaintiff, particularly in his political activities and public appearances, through a coordinated and sustained campaign of defamation, harassment, and incitement to hatred.
- 39. The individual defendants acted maliciously and in concert with each other, with a common design to:
 - (1) Cause reputational harm to the plaintiff;
 - (2) Inflict emotional distress and humiliation upon the plaintiff;
 - (3) Inflict fear for the plaintiff's personal safety through threats and harassment;
 - (4) Discredit the plaintiff's political activities and public appearances to undermine his credibility
 - (5) Create a hostile environment to deter the plaintiff from participating in public discourse and professional activities;

- (6) Silence the plaintiff's advocacy as a pro-democracy activist and undermine his efforts against dictatorial forms of governance; and
- (7) Intimidate the plaintiff into withdrawing from public advocacy and ceasing criticism of authoritarian practices.

Unlawful Means Conspiracy

40. Between approximately December 24, 2023, and continuing to at least May 23, 2024, the defendant Reza Pahlavi, acting personally and through his affiliates, and the remaining individual defendants, acting in concert with each other and with X Corp., conspired by using unlawful means to harm the plaintiff.

41. The individual defendants acted in combination, by agreement, or with a common design to achieve their purposes through unlawful means, which included the following:

- (1) Amplifying and disseminating defamatory and harassing content concerning the plaintiff on **X** and elsewhere on the Internet (the "Act of Defamation");
- (2) Communicating statements publicly on **X** and elsewhere on the Internet to the world at large, inciting hatred against the plaintiff based on the plaintiff's political or ideological identity, including as a pro-democracy activist opposing dictatorship and alleged political affiliations, contrary to section 319(1) of the Criminal Code of Canada ("the Act of Public Incitement of Hatred");
- (3) Communicating statements publicly on **X** and elsewhere on the Internet to the world at large, Willfully promoting hatred against the plaintiff based on the plaintiff's political or ideological identity, including as a pro-democracy activist opposing dictatorship and alleged political affiliations,, contrary to section 319(2) of the Criminal Code of Canada (the "Act of Wilful Promotion of Hatred"); and
- (4) Knowingly uttering, conveying, or causing to receive, threats to cause death or bodily harm to the plaintiff, contrary to section 264.1 of the Criminal Code of Canada (the "Act of Uttering Threats").

Common Allegations of Conspiracy

42. At all material times, the individual defendants acted in combination, by agreement, or with a common design to achieve unlawful purposes and to use unlawful means to accomplish their purposes.
43. The agreement between the individual defendants was partially reflected in oral communications and partially in written communications commencing on or about December 25, 2023. At that time, the agreement was reached among the individual defendants, including **Minachi Kamancheh**, **Lagertha**, and **Khorramshahi**, when they were residing in Greater Vancouver or elsewhere in British Columbia, and the John Doe defendants, whose locations have been unknown. This agreement reached on or about December 25, 2024, was immediately followed and implemented by contemporaneous publication of similar and identical defamatory and harassing statements by the defendants, reflecting their common design and coordination.
44. The conspiracy was designed and agreed upon to achieve maximum harm to the plaintiff by coordinating and disseminating defamatory and harassing publications primarily on **X** and elsewhere on the Internet, decorated with dehumanizing language, sexual slurs, profanities, and threats of violence, creating an environment of hostility and fear.
45. Between approximately December 25, 2023, and continuing to at least May 23, 2024, the defendants **Minachi**, **Kamancheh**, **Khorramshahi**, and **Lagertha** actively sustained the conspiracy by coordinating and fabricating scenarios to escalate and maintain the vilification campaign. These scenarios, were concurrently agreed upon among all of the individual defendants and implemented collectively by amplifying and disseminating defamatory and harassing content about the plaintiff on **X** and elsewhere on the Internet.
46. **X Corp.**, as the owner and operator of the publishing platform **X** (formerly **Twitter**), contributed to the conspiracy by allowing, promoting, and amplifying the publications of the individual defendants against the plaintiff. At all material times, **X Corp.** exercised editorial control over the impugned content published on **X**, including

amplifying publications through its algorithms, and engagement mechanisms such as likes and reposts.

47. Despite having actual or constructive knowledge of the damaging, unlawful and conspiratorial nature of the content published on its platform, **X Corp.** failed to take reasonable steps to remove or mitigate the harm caused by these actions, despite multiple requests by the plaintiff.

48. At all material times, the defendants knew or ought to have known that their actions would cause significant harm to the plaintiff, including reputational damage, emotional distress, and threats to his personal safety. Despite this knowledge, at all material times, the defendants persisted in their malicious conduct.

49. Each of the defamatory publications pleaded hereafter in this notice of civil claim, in sections D-BBB of Part 1, including their respective publishers and the defamatory stings arising from each publication, forms the basis of the plaintiff's cause of action in defamation against the named publishers, including those named as John Doe defendants.

50. Additionally, each of these publications was disseminated in furtherance of the conspiracy by all defendants, acting in concert as pleaded herein, to achieve the unlawful purposes or employ the unlawful means set out above.

51. Through these publications, including the attached defamatory stings, the following acts were committed by the defendants in furtherance of the alleged civil conspiracy:

- (1) The Act of Defamation described in paragraph 41, by the defendants **X Corp., Arash Kamancheh, Maryam Lagertha, Sedigheh Minachi, Azar Khorramshahi, John Doe 1, John Doe 2, John Doe 3, John Doe 4, John Doe 5, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, John Doe 11**, and, through agency, **Reza Pahlavi**;
- (2) The Act of Public Incitement of Hatred described in paragraph 41, by the defendants **X Corp., Arash Kamancheh, Maryam Lagertha, Sedigheh Minachi, Azar Khorramshahi, John Doe 1, John Doe 2, John Doe 3, John**

Doe 4, John Doe 5, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, John Doe 11, and, through agency, Reza Pahlavi;

(3) The Act of Wilful Promotion of Hatred described in paragraph 41, by the defendants **X Corp., Arash Kamancheh, Maryam Lagertha, Sedigheh Minachi, Azar Khorramshahi, John Doe 1, John Doe 2, John Doe 3, John Doe 4, John Doe 5, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, John Doe 11, and, through agency, Reza Pahlavi;**

(4) The Act of Uttering Threats described in paragraph 41, by the defendants, **X Corp., Sedigheh Minachi, Maryam Lagertha, John Doe 1, John Doe 3, John Doe 4, John Doe 5, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 11, John Doe 12, and, through agency, Reza Pahlavi.**

52. The plaintiff pleads that the coordinated actions of the defendants, including the publication and amplification of the impugned statements, were designed to inflict maximum harm upon the plaintiff by causing reputational damage, emotional distress, and intimidation, thereby silencing the plaintiff's voice and deterring his advocacy and political activities.

53. As a direct and foreseeable result of the defendant's conspiracy, the plaintiff has suffered significant harm, including:

- (1) Damage to his reputation in British Columbia and elsewhere;
- (2) Severe emotional distress, humiliation, and anxiety;
- (3) Threats to his personal safety and well-being, which have hindered his ability to participate in public and professional activities; and
- (4) Costs incurred to defend against threats and harassment.

D. Defamatory Content: *Lagertha#001 Content*

published by: **Lagertha, X Corp., Khorramshahi, Kamancheh, John Doe 3, and, through agency, Reza Pahlavi**

54. On or about December 25, 2023, **Lagertha** and **X Corp.** published the content below concerning the plaintiff on **Lagertha's X** account ("**Lagertha#001 Content**"), following which, on or about December 25, 2024, this same content was republished on **X** by **X Corp.**, **Khorramshahi**, **Kamancheh**, and **John Doe 3**. **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

55. *Lagertha#001 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Lagertha#001 Content* :

[@Maryam_Lagertha:]

‘Mr. Masood Masjoody attempted a few months ago to infiltrate the club of true monarchists under the guise of a nationalist. However, as you can see, he ended up on the side of mercenary agents like Ali Ebrahimzadeh and Sho’oobiye, etc.’

‘As I mentioned before, he was deeply angered by hearing the slogan "Shah Remains Eternal" from our group in Vancouver and its repetition by the Israelis, and afterwards, he wrote very aggressive tweets, calling us Qasemvillians.’

‘One flag, one unified Iran, and only the Shah Remains Eternal, and we say until our last breath, "I sacrifice my life for Iran.’

‘#Shah_Remains_Eternal’

‘#Long_Live_United_Iran’

‘#Lion_and_Sun_Flag”

56. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Lagertha#001* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Monarchist Infiltration Sting described in paragraph 36.
- (2) The Regime Mercenary Sting described in paragraph 36.
- (3) The Regime Mercenary Side Sting described in paragraph 36.
- (4) The Regime Thug Sting described in paragraph 36.
- (5) The Ethical Dirtiness Sting described in paragraph 36.

E. Defamatory Content: *Lagertha#002 Content*

published by: **Lagertha, X Corp.**, and, through agency, **Reza Pahlavi**

57. On or about December 26, 2023, **Lagertha** and **X Corp.** published the content below concerning the plaintiff on **Lagertha's X** account ("***Lagertha#002 Content***"), following which, on or about December 25, 2024, this same content was republished on **X** by **X Corp.** **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

58. *Lagertha#002 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Lagertha#002 Content* :

[@Maryam_Lagertha:]

"Dear Arash [Kamancheh], he made desperate efforts, and we have always been patient. But since he has been trying for a long time to disrupt our work, silence is no longer justifiable. If, as he claims, he is interested in the republican system, there is no problem. We all have a vote in Iran's future, but his being a companion of the Regime's agents and subverting us have exhausted my patience, and I felt it was my duty as a patriot to inform you of some of his actions."

59. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Lagertha#002* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Companion of Regime Agents Sting described in paragraph 36.
- (2) The Regime Agents Association Sting described in paragraph 36.
- (3) The Monarchist Subversion Sting described in paragraph 36.
- (4) The Monarchist Disruption Sting described in paragraph 36.
- (5) The Ethical Dirtiness Sting described in paragraph 36.

F. Defamatory Content: *Lagertha#003 Content*

published by: **Lagertha, X Corp.**, and, through agency, **Reza Pahlavi**

60. On or about December 26, 2023, **Lagertha** and **X Corp.** published the content below concerning the plaintiff on **Lagertha's X** account ("***Lagertha#003 Content***"), following which, on or about December 25, 2024, this same content was republished on **X** by **X Corp.** **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

61. *Lagertha#003 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Lagertha#003 Content*.

[@Maryam_Lagertha:]

"Maury, these are the heads of the snake abroad. Each one of them must be exposed and disgraced. Because they appear in parliaments like that Akhoondi and ... or in the lobbies of the Islamic Republic. The insiders are doing their job, and we broadcast their

voices everywhere, alongside exposing the voices of these mercenaries and their puppeteers.”

62. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Lagertha#003* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Regime Leader Abroad Sting described in paragraph 36.
- (2) The Regime Mercenary Sting described in paragraph 36.
- (3) The Regime Mercenary Side Sting described in paragraph 36.
- (4) The Mercenary Sting described in paragraph 36.
- (5) The Regime Agents Association Sting described in paragraph 36.
- (6) The Ethical Dirtiness Sting described in paragraph 36.
- (7) The Disgraceful Sting described in paragraph 36.

G. Defamatory Content: *Lagertha#004 Content*

published by: **Lagertha**, and, through agency, **Reza Pahlavi**

63. On or about December 26, 2023, **Lagertha** published the content below concerning the plaintiff from Lagertha’s **X** account as a direct message on **X** to another **X** account, owned by an individual named **Avideh Motmaen-Far** (“***Lagertha#004 Content***”). At that time, Avideh Motmaen-Far and the plaintiff were the president and vice-president of the Council of Iranian Canadians (“CIC”).

64. *Lagertha#004 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Lagertha#004 Content*:

[@Maryam_Lagertha:]

“Does his election as your vice president, considering these, help you? Furthermore, he is a close friend of Vahid Beheshti and a supporter of Alireza Akhondi. What other reason do you need to

know that he is a corrupt individual, and his placement alongside you in no way sends us a positive signal?.”

65. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Lagertha#004 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Corruption Sting described in paragraph 36.
- (2) The Regime Agents Association Sting described in paragraph 36.
- (3) The Companion of Regime Agents Sting described in paragraph 36.
- (4) The Dishonourable Sting described in paragraph 36.

H. Defamatory Content: *JD1#001 Content*

published by: **John Doe 1, John Doe 3, Lagertha, John Doe 12, Mirazimi, X Corp.**, and, through agency, **Reza Pahlavi**

66. On or about December 26, 2023, **John Doe 1** and **X Corp.** published the content below concerning the plaintiff on **John Doe 1’s X** account (“***JD1#001 Content***”), following which, on or about December 26, 2024, this same content was republished on **X** by **X Corp., Lagertha, John Doe 2, John Doe 3, John Doe 12** and **Mirazimi**. **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

67. *JD1#001 Content* is partly in the Persian language and partly in the English language, in the form of an attached image. The following is a fair and accurate translation of the Persian language texts within this content followed by the English content within the attached image, collectively constituting *JD1#001 Content*:

[@Kasrakarimi3:]

“Mr. @MasoodMasjoody, is it true that in 2020 you were dismissed from your job for the crime of harassment and bullying, meaning harassing and bullying a female colleague? Mr. Masjoody, is it true that you have been convicted of misogyny?

‘News link:

<https://burnabybeacon.com/p/sfu-harassment-math-conspiracy-defamation>’

[English text within attached image:]

‘But in April 2020, Masjoody’s employment was terminated, and he immediately launched a lawsuit. In the lawsuit, he claimed Trotignon “maliciously started to distribute false claims” about him, while SFU allegedly singled him out for “harassment and bullying.”

68. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD1#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Harassment and Bullying Expulsion Sting described in paragraph 36.
- (2) The Misogyny Conviction Sting described in paragraph 36.
- (3) The Misogynistic Tone Sting described in paragraph 36.
- (4) The SFU Harassment Expulsion Sting described in paragraph 36.
- (5) The University Expulsion Sting described in paragraph 36.

I. Defamatory Content: *JD1#002 Content*

published by: **John Doe 1, John Doe 7, John Doe 12, Mirazimi, X Corp.**, and, through agency, **Reza Pahlavi**

69. On or about December 26, 2023, **John Doe 1** and **X Corp.** published the content below concerning the plaintiff on **John Doe 1’s X** account (“*JD1#002 Content*”), following which, on or about December 26, 2024, this same content was republished

on **X** by **X Corp.**, **John Doe 7**, **John Doe 12**, and **Mirazimi. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

70. *JD1#002 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *JD1#001 Content*:

[@Kasrakarimi3:]

“Last night they had a (X) Spaces meeting with Imam [Khomeini, founder of the Regime] forces.”

71. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD1#002 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Regime Agents Association Sting described in paragraph 36.
- (2) The Regime Mercenary Sting described in paragraph 36.
- (3) The Regime Thug Sting described in paragraph 36.
- (4) The Khomeini Forces Meeting Sting in paragraph 34.

J. Defamatory Content: *JD1#003 Content*

published by: **John Doe 1**, **John Doe 2**, **John Doe 7**, **John Doe 9**, **Khorramshahi**, **Lagertha**, **X Corp.**, and, through agency, **Reza Pahlavi**

72. On or about February 10, 2024, **John Doe 1** and **X Corp.** published the content below concerning the plaintiff on **John Doe 1**'s **X** account (“*JD1#001 Content*”), following which, on or about February 10, 2024, this same content was republished on **X** by **X Corp.**, **John Doe 2**, **John Doe 7**, **John Doe 9**, **Khorramshahi**, and **Lagertha**. **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet

content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

73. *JD1#003 Content* is the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *JD1#003 Content*:

[@Kasrakarimi3:]

“Unfortunately, I have to say that in the last 72 hours, Mr. Masood Masjoody has not filed a complaint against anyone in the British Columbia court and has not raised a victory bell in any case!”

‘p.s.: Man! Take a move!’

‘This situation is ugly, dirty, obscene :)))’

‘#IRGCterrorists’”

74. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD1#003 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Professional Complainer Sting described in paragraph 36.
- (2) The Regime Mercenary Sting described in paragraph 36.
- (3) The Terrorist Sting described in paragraph 36.
- (4) The IRGC Member Sting described in paragraph 36.

K. Defamatory Content: *JD1#004 Content*

published by: **John Doe 1, John Doe 2, John Doe 3, John Doe 6, John Doe 7, Minachi, Khorramshahi, X Corp.**, and, through agency, **Reza Pahlavi**

75. On or about April 25, 2024, **John Doe 1** and **X Corp.** published the content below concerning the plaintiff on **John Doe 1’s X** account (“*JD1#004 Content*”), following which, on or about April 25, 2024, this same content was republished on **X** by **X Corp., John Doe 2, John Doe 3, John Doe 6, John Doe 7, Minachi,** and **Khorramshahi.**

Reza Pahlavi is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including *viewers* and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

76. *JD1#004 Content* is the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *JD1#003 Content*:

[**@Kasrakarimi3:**]

“Let me tell you something, just between us [rolling face with tears of joy emoji]’

‘Because of his conviction in court for sexually harassing two women, he went on a hunger strike and then deceived people under the guise of fighting against the IRGC terrorist forces.’

‘Little MEK member [triple face with tears of joy emoji]’

‘#IRGCterrorists’

‘#MEKterrorists’

‘#Crested_Pigeon’

[reply from **@iranianpappppi3:**]

‘Are you talking about the street dweller of Vancouver? [triple face with tears of joy emoji]’

[reply from **@Kasrakarimi3:**]

‘Exactly [face with tears of joy emoji]’

77. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD1#004 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Sexual Harassment History Sting described in paragraph 36.

- (2) The Sexual Abuser Sting described in paragraph 36.
- (3) The Sexual Harassment Conviction Sting described in paragraph 36.
- (4) The Manipulative Sting described in paragraph 36.
- (5) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36.
- (6) The Terrorist Sting described in paragraph 36.
- (7) The IRGC Member Sting described in paragraph 36.
- (8) The MEK Member Sting described in paragraph 36.
- (9) The Professional Complainer Sting described in paragraph 36.
- (10) The Homeless Sting described in paragraph 36.
- (11) The Crested Pigeon Sting described in paragraph 36.

L. Defamatory Content: *Khorramshahi#001 Content*

published by: **Khorramshahi, X Corp.**, and, through agency, **Reza Pahlavi**

78. On or about December 26, 2023, **Khorramshahi** and **X Corp.** published the content below concerning the plaintiff on **Khorramshahi's X** account ("***Khorramshahi#001 Content***"), following which, on or about December 26, 2024, this same content was republished by **X Corp.** on **X. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

79. *Khorramshahi#001 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Khorramshahi#001 Content*:

[@azarkhorramsha1:]

“Like [Hamed] Esmaeilion, he abused the kind and caring Iranian community in Canada.”

80. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Khorramshahi#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) the Iranian Community Abuser Sting described in paragraph 36.

M. Defamatory Content: *JD2#001 Content*

published by: **John Doe 2, John Doe 1, X Corp.**, and, through agency, **Reza Pahlavi**

81. On or about December 26, 2023, **John Doe 2** and **X Corp.** published the content below concerning the plaintiff on **John Doe 2's X**, following which, on or about December 26, 2024, this same content was republished by **John Doe 1** and **X Corp.** on **X**. **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

82. *JD2#001 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *JD2#001 Content*:

[@Enghelab22:]

“The dimensions of this escape forward should not solely be attributed to the misogyny of this disgraced individual. Its dimensions should be explored in connection with Afshin Jam (the daughter and father) [Nazanin Afshin Jam & Afshin Afshin Jam] and [Kaveh] Shahrooz, who are all have their heads in the manger of funds from Qomikala [Masih Alinejad]. Are they playing for free on the side of the Islamic Republic? No. The moon does not

remain hidden behind the clouds, and their connection with the Ministry of Intelligence of the Islamic Republic will be exposed.”

83. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD2#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Misogynist Sting described in paragraph 36.
- (2) The Disgraced Individual Sting described in paragraph 36.
- (3) The Ministry of Intelligence Association Sting described in paragraph 36.
- (4) The Funding from Alinejad Sting described in paragraph 36.
- (5) The Regime Thug Sting described in paragraph 36.
- (6) The Regime Mercenary Sting described in paragraph 36.
- (7) The Companion of Regime Agents Sting described in paragraph 3

N. Defamatory Content: *JD3#001 Content*

published by: **John Doe 3, John Doe 1, John Doe 4, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, John Doe 11, John Doe 12, Khorramshahi, Lagertha, Bahrami, Mirazimi, X Corp.**, and, through agency, **Reza Pahlavi**

84. On or about December 30, 2023, **John Doe 3** and **X Corp.** published the content below concerning the plaintiff on one of **John Doe 3's X** account (“***JD3#001 Content***”), following which, on or about December 30, 2024, this same content was republished on **X** by **X Corp., John Doe 1, John Doe 3, John Doe 4, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, John Doe 11, John Doe 12, Khorramshahi, Lagertha, Bahrami** and **Mirazimi**. **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

85. *JD3#001 Content* is partly in the Persian language and party in the English language, in the form of an attached image. The following is a fair and accurate translation of the Persian language texts within this content followed by the English content within the attached image, collectively constituting *JD3#001 Content*:

[@adam_hesabi:]

“Tweet Thread:’

‘When those who claim to support women's rights and the slogan "Women, Life, Freedom" use a woman abuser to advance their goals!’

‘You must have seen that these days the fake opposition has found a new shrine [/saint] from which to throw dirt against the prince [Reza Pahlavi] and his associates:’

‘Masood Masjoody who has a very brilliant record [of abusing women]!’

[picture]

‘This woman is the one targeted by Masood Masjoody for harassment and bullying. Amélie Trotignon, a classmate of Masjoody during their doctoral studies in mathematics at Simon Fraser University in Canada.’

‘Now, what's the story?’

‘Both obtained their Ph.D. in Mathematics from Simon Fraser University in 2019. They were both colleagues in the Mathematics department. Amélie was actually accepted into a joint Ph.D. program between the French university "François Rabelais" and Simon Fraser University in Canada in 2017 and was constantly commuting between the two countries. In 2017 and 2018, the relationship between Masjoody and Amélie was friendly, to the

extent that when she was returning to France in April 2018, Masjoody gave her a ride to the airport.'

'During this time, Masjoody fell in love with Amélie. In spring 2019, when Amélie was returning to Canada, Masjoody again offered to pick her up at the airport, but Amélie declined, stating that a taxi had been reserved for her by the university. Masjoody complained about this response and asked Amélie to talk about it. Amélie, however, responded that multiple messages and persistence from Masjoody to pick her up at the airport made her uncomfortable and asked him to stop. This marked the beginning of Masjoody's harassment of Amélie. So much so that after Amélie returned to Simon Fraser University, Masjoody did not leave her alone and continuously sent her harassing messages. Eventually, in May 2019, Amélie blocked his number. However, Masjoody started emailing and stalking her. Masjoody would wait for Amélie outside her class and would follow her on campus. In August 2019, Amélie returned to France and filed a complaint against Masjoody with the Human Rights Office.'

'The Human Rights Office tried to persuade Masjoody to adhere to the sole request of Amélie, which was to cease contact with her.'

'To reach a common solution[?], and it closed the case.'

'However, in April 2020, the new head of the Mathematics department at Simon Fraser University sent a letter to Masjoody, terminating their collaboration "for reasonable and fair reasons." '

'Masjoody, who had been expelled from the university due to ethical and administrative violations, including harassing his female colleague, in a forward escape, stated that the reason for his

expulsion was protesting against the influence of IRGC agents and filed a complaint.'

'Of course, the complaint was rejected.'

'Masjoody's harassment did not end only with Amélie.'

'According to the judge's verdict, Masjoody's harassment campaign against Amélie and two female employees of the university's mathematics department, Mishna and Kropinski, intensified from October 2020 and continued for six months. According to Judge Fitzpatrick, Masjoody's tone in the fall 2020/early 2021 posts regarding female professors and staff was completely misogynistic and he had given them specific names. For example, he wrote about Mishna and Kropinski: "Fake feminists whose deaths will cause me no grief."

'In January 2021, he sent emails to their employers and also to Ameli's employer, and defamed them.'

'In the Supreme Court of British Columbia's ruling, which was exactly upheld in the Court of Appeal, Masjoody's campaigns of abuse and harassment against his female colleagues were pointed out.'

'The Court of Appeal judge in affirming the ruling of the Supreme Court of British Columbia described Masjoody's affidavits and posts as "satanic," "bizarre," and "certainly misogynistic." '

'Interestingly, at the time Masjoody had dwelled in a tent and gone on a hunger strike and claimed to the media that his case was related to the influence of the Islamic Revolutionary Guard Corps, whereas his case had absolutely no connection with the issue of the Islamic Revolutionary Guard Corps.'

'Who covered his news?'

[Link to an X post by Faranews]

‘Fara News, managed by an anti-Pahlavi figure close to Vahid Beheshti, and Dorr TV. Given that Vahid Beheshti has openly defended the MEK, it is not surprising to say that this disinformation campaign that has recently started and has involved seemingly contradictory individuals and groups from Masih Alinejad to Shervan Fashandi against the prince and his team, is directed by the MEK. A charlatan, harasser, and liar with various mental illnesses has become a means of revenge. Of course, you have failed and been disgraced, and this is just the beginning of the story.’

‘For a better understanding of the extent of Masjoodi's harassment and misogyny towards his female colleagues, it is not a bad idea to look at some excerpts from SFU's Human Rights Office's descriptions of Masjoodi's behavior, as quoted by Amélie:

- 1-He was sexist and did not accept no for an answer.
- 2- He had obsessive compulsion towards Amélie Trotignon.
- 3- He was a stereotypical sexist who did not understand boundaries.
- 4- He was dishonest and selfish.
5. Is not trustworthy.
6. Paid no attention to Amélie Troutignon's rights, including having space, privacy, and advancing her visions.’

‘Everything I have written about Masjoodi's case and his harassment against his female colleagues is documented and verifiable in this link.

[Link to CanLII]

‘Masjoody's complaint was addressed three times, once in the British Columbia Supreme Court, and twice in the British Columbia Court of Appeal. In total, seven judges ruled that Masjoody's claim against his female colleague and Simon Fraser University (SFU) was baseless.’

‘In fact, the court ordered Masjoody to cease his online campaign, including a misogynistic website and numerous posts on Twitter and Facebook against his former colleagues. This is about your saint, Masjoody. We'll also come for your other saints.’

‘The end.’

[English text within attached image:]

‘Online harassment campaign’

‘As the case was being litigated, in October 2020, Masjoody escalated an online campaign against Trotignon and, especially, Mishna and Kropinski.’

‘ “Dr. Masjoody’s online campaign over the next six months would involve substantial and increasingly vitriolic and bizarre postings on Facebook and Twitter. He also created a website entitled ‘FeminaziGate’ and made substantial posts on that website,” Fitzpatrick wrote.’

‘Masjoody alleged SFU’s actions against him “arose as a form of revenge for his written complaint to SFU administration in April 2019,” according to the ruling.’

“Dr. Masjoody’s tone in his fall 2020/early 2021 postings is decidedly misogynistic in relation to the female professors and

employees who are specifically named, notably Drs. Kropinski and Mishna,” stated Fitzpatrick.’

‘Referring to Mishna and Kropinski, Masjoody wrote about “fake feminists whose death would not bring any sorrow to me.”’

”

86. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD3#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Bully Sting described in paragraph 36
- (2) The Charlatan Sting described in paragraph 36
- (3) The Disgraced Individual Sting described in paragraph 36
- (4) The Harasser Sting described in paragraph 36
- (5) The Liar Sting described in paragraph 36
- (6) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (7) The Misogynist Sting described in paragraph 36
- (8) The Fake Opposition Saint Sting described in paragraph 36
- (9) The Sexist Sting described in paragraph 36
- (10) The Sexual Abuser Sting described in paragraph 36
- (11) The Boundary Violator Sexist Sting described in paragraph 36
- (12) The Woman Abuser Sting described in paragraph 36
- (13) The Fake Opposition Tool Sting described in paragraph 36
- (14) The Harassing Messages to Trotignon Sting described in paragraph 36
- (15) The Misogyny Conviction Sting described in paragraph 36
- (16) The University Expulsion Blame Sting described in paragraph 36
- (17) The Defamation of Colleagues Sting described in paragraph 36

- (18) The MEK Disinformation Campaign Sting described in paragraph 36
- (19) The Hunger Strike Disguise described in paragraph 36
- (20) The Dishonesty Sting described in paragraph 36
- (21) The Dishonourable Sting described in paragraph 36
- (22) The University Dismissal for Obsession Sting described in paragraph 36
- (23) The Revenge Harassment Sting described in paragraph 36
- (24) The Ethical Dirtiness Sting described in paragraph 36
- (25) The SFU Administrative Expulsion Sting described in paragraph 36
- (26) The SFU Ethical Expulsion Sting described in paragraph 36
- (27) The SFU Harassment Expulsion Sting described in paragraph 36
- (28) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (29) The University Expulsion Sting described in paragraph 36
- (30) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (31) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (32) The Greed Sting described in paragraph 36
- (33) The Trotignon Harassment Sting described in paragraph 36
- (34) The University Bullying Sting described in paragraph 36
- (35) The Multiple Women Harassment Sting described in paragraph 36
- (36) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (37) The Misogynistic Tone Sting described in paragraph 36
- (38) The Online Harassment Order Sting described in paragraph 36
- (39) The Court Ruling for Women Harassment Sting described in paragraph 36
- (40) The Verified Harassment Case Sting described in paragraph 36

- (41) The Harassment History Sting described in paragraph 36
- (42) The Sexual Harassment History Sting described in paragraph 36
- (43) The Misogynistic Website Sting described in paragraph 36
- (44) The Baseless Court Case Sting described in paragraph 36
- (45) The Obsessive Compulsion Sting described in paragraph 36
- (46) The Bizarre Affidavits Sting described in paragraph 36
- (47) The Misogynistic Affidavits Sting described in paragraph 36
- (48) The Satanic Affidavits Sting described in paragraph 36
- (49) The MEK Friends at Fara News Sting described in paragraph 36
- (50) The Multiple Rulings for Harassment Sting described in paragraph 36
- (51) The Misogynistic Posts Sting described in paragraph 36
- (52) The Mental Illness Sting described in paragraph 36
- (53) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (54) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (55) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (56) The IRGC Court Case Lie Sting described in paragraph 36
- (57) The Expulsion Lie Sting described in paragraph 36
- (58) The Untrustworthiness Sting described in paragraph 36
- (59) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (60) The Selfish Sting described in paragraph 36
- (61) The Trotignon Stalking Sting described in paragraph 36
- (62) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

O. Defamatory Content: *JD3#002 Content*

published by: **John Doe 3, X Corp.**, and, through agency, **Reza Pahlavi**

87. On or about December 30, 2023, **John Doe 3** and **X Corp.** published the content below concerning the plaintiff on one of **John Doe 3's X** account ("***JD3#002 Content***"), following which, on or about December 30, 2024, this same content was republished by **X Corp.** on **X. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

88. *JD3#002 Content* is in the Persian language and is a reply to another user's reply to *JD3#001 Content*. The following is a fair and accurate translation of the Persian language texts that constitute *JD3#002 Content* and the preceding reply to *JD3#001*.

[@Mahnush19, republished by John Doe 3:]

““How dirty they are.”.”

[@adam_hesabi:]

“All of them are like that, lewd and rapist..”

[@Mahnush19, republished by John Doe 3:]

““Dirty in the true sense of the word they are.”.”

89. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD3#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Dishonourable Sting described in paragraph 36.
- (2) The Disgraced Individual Sting described in paragraph 36.
- (3) The Rapist Sting described in paragraph 36.
- (4) The Ethical Dirtiness Sting described in paragraph 36.

P. Defamatory Content: *JD3#003 Content*

published by: **John Doe 3, X Corp.**, and, through agency, **Reza Pahlavi**

90. On or about January 1, 2024, **John Doe 3** and **X Corp.** published the content below concerning the plaintiff on the **John Doe 3's X** account **@adam_hesabi1** ("***JD3#003 Content***"), following which, on or about January 1, 2024, this same content was republished by **X Corp.** on **X. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

91. *JD3#003 Content* is in the Persian language that quotes *JD3#001 Content*, and consists of both *JD3#001 Content*, by way of republication, and added text to it. The following is a fair and accurate translation of that Persian language added texts that *JD3#003 Content* included:

[@adam_hesabi1, quoting *JD3#001 Content*.]

"Promise is kept. As promised, I made this tweet thread the pinned tweet on my other account. Please, if you are fluent in other languages, translate it so that everyone can see and know this sexual abuser better so that the Masjoody and his alikes will have to go to their homeland and go to their main job in the IRGC :)"

92. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the added text within *JD3#003 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Sexual Abuser Sting described in paragraph 36.
- (2) The IRGC Member Sting described in paragraph 36.
- (3) The IRGC Employment Sting described in paragraph 36.

- (4) The Terrorist Sting described in paragraph 36.
- (5) The Regime Mercenary Sting described in paragraph 36.
- (6) The Untrustworthiness Sting described in paragraph 36

93. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the republication of *JD3#001 Content* within *JD3#003 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Bully Sting described in paragraph 36
- (2) The Charlatan Sting described in paragraph 36
- (3) The Disgraced Individual Sting described in paragraph 36
- (4) The Harasser Sting described in paragraph 36
- (5) The Liar Sting described in paragraph 36
- (6) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (7) The Misogynist Sting described in paragraph 36
- (8) The Fake Opposition Saint Sting described in paragraph 36
- (9) The Sexist Sting described in paragraph 36
- (10) The Sexual Abuser Sting described in paragraph 36
- (11) The Boundary Violator Sexist Sting described in paragraph 36
- (12) The Woman Abuser Sting described in paragraph 36
- (13) The Fake Opposition Tool Sting described in paragraph 36
- (14) The Harassing Messages to Trotignon Sting described in paragraph 36
- (15) The Misogyny Conviction Sting described in paragraph 36
- (16) The University Expulsion Blame Sting described in paragraph 36
- (17) The Defamation of Colleagues Sting described in paragraph 36
- (18) The MEK Disinformation Campaign Sting described in paragraph 36

- (19) The Hunger Strike Disguise described in paragraph 36
- (20) The Dishonesty Sting described in paragraph 36
- (21) The Dishonourable Sting described in paragraph 36
- (22) The University Dismissal for Obsession Sting described in paragraph 36
- (23) The Revenge Harassment Sting described in paragraph 36
- (24) The Ethical Dirtiness Sting described in paragraph 36
- (25) The SFU Administrative Expulsion Sting described in paragraph 36
- (26) The SFU Ethical Expulsion Sting described in paragraph 36
- (27) The SFU Harassment Expulsion Sting described in paragraph 36
- (28) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (29) The University Expulsion Sting described in paragraph 36
- (30) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (31) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (32) The Greed Sting described in paragraph 36
- (33) The Trotignon Harassment Sting described in paragraph 36
- (34) The University Bullying Sting described in paragraph 36
- (35) The Multiple Women Harassment Sting described in paragraph 36
- (36) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (37) The Misogynistic Tone Sting described in paragraph 36
- (38) The Online Harassment Order Sting described in paragraph 36
- (39) The Court Ruling for Women Harassment Sting described in paragraph 36
- (40) The Verified Harassment Case Sting described in paragraph 36
- (41) The Harassment History Sting described in paragraph 36

- (42) The Sexual Harassment History Sting described in paragraph 36
- (43) The Misogynistic Website Sting described in paragraph 36
- (44) The Baseless Court Case Sting described in paragraph 36
- (45) The Obsessive Compulsion Sting described in paragraph 36
- (46) The Bizarre Affidavits Sting described in paragraph 36
- (47) The Misogynistic Affidavits Sting described in paragraph 36
- (48) The Satanic Affidavits Sting described in paragraph 36
- (49) The MEK Friends at Fara News Sting described in paragraph 36
- (50) The Multiple Rulings for Harassment Sting described in paragraph 36
- (51) The Misogynistic Posts Sting described in paragraph 36
- (52) The Mental Illness Sting described in paragraph 36
- (53) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (54) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (55) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (56) The IRGC Court Case Lie Sting described in paragraph 36
- (57) The Expulsion Lie Sting described in paragraph 36
- (58) The Untrustworthiness Sting described in paragraph 36
- (59) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (60) The Selfish Sting described in paragraph 36
- (61) The Trotignon Stalking Sting described in paragraph 36
- (62) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

Q. Defamatory Content: *JD3#004 Content*

published by: **John Doe 3, X Corp.**, and, through agency, **Reza Pahlavi**

94. On or about January 17, 2024, **John Doe 3** and **X Corp.** published the content below concerning the plaintiff on the **John Doe 3's X** account **@adam_hesabi** ("**JD3#004 Content**"), following which, on or about January 17, 2024, this same content was republished by **X Corp.** on **X. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

95. *JD3#004 Content* is in the Persian language that quotes *JD3#001 Content*, and consists of both *JD3#001 Content*, by way of republication, and added text to it. The following is a fair and accurate translation of that Persian language added texts that *JD3#004 Content* included:

[@adam_hesabi1, quoting *JD3#001 Content*.]

"This is the documentary tweet thread about Masood Masjoody being a rapist."

"#Boycot_Iran_International_TV"

96. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the added text within *JD3#004 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Rapist Sting described in paragraph 36.
- (2) The Sexual Abuser Sting described in paragraph 36.
- (3) The Harassment History Sting described in paragraph 36.
- (4) The Untrustworthiness Sting described in paragraph 36

97. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the republication of *JD3#001 Content* within *JD3#004 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Bully Sting described in paragraph 36
- (2) The Charlatan Sting described in paragraph 36
- (3) The Disgraced Individual Sting described in paragraph 36
- (4) The Harasser Sting described in paragraph 36
- (5) The Liar Sting described in paragraph 36
- (6) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (7) The Misogynist Sting described in paragraph 36
- (8) The Fake Opposition Saint Sting described in paragraph 36
- (9) The Sexist Sting described in paragraph 36
- (10) The Sexual Abuser Sting described in paragraph 36
- (11) The Boundary Violator Sexist Sting described in paragraph 36
- (12) The Woman Abuser Sting described in paragraph 36
- (13) The Fake Opposition Tool Sting described in paragraph 36
- (14) The Harassing Messages to Trotignon Sting described in paragraph 36
- (15) The Misogyny Conviction Sting described in paragraph 36
- (16) The University Expulsion Blame Sting described in paragraph 36
- (17) The Defamation of Colleagues Sting described in paragraph 36
- (18) The MEK Disinformation Campaign Sting described in paragraph 36
- (19) The Hunger Strike Disguise described in paragraph 36
- (20) The Dishonesty Sting described in paragraph 36
- (21) The Dishonourable Sting described in paragraph 36
- (22) The University Dismissal for Obsession Sting described in paragraph 36
- (23) The Revenge Harassment Sting described in paragraph 36
- (24) The Ethical Dirtiness Sting described in paragraph 36

- (25) The SFU Administrative Expulsion Sting described in paragraph 36
- (26) The SFU Ethical Expulsion Sting described in paragraph 36
- (27) The SFU Harassment Expulsion Sting described in paragraph 36
- (28) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (29) The University Expulsion Sting described in paragraph 36
- (30) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (31) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (32) The Greed Sting described in paragraph 36
- (33) The Trotignon Harassment Sting described in paragraph 36
- (34) The University Bullying Sting described in paragraph 36
- (35) The Multiple Women Harassment Sting described in paragraph 36
- (36) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (37) The Misogynistic Tone Sting described in paragraph 36
- (38) The Online Harassment Order Sting described in paragraph 36
- (39) The Court Ruling for Women Harassment Sting described in paragraph 36
- (40) The Verified Harassment Case Sting described in paragraph 36
- (41) The Harassment History Sting described in paragraph 36
- (42) The Sexual Harassment History Sting described in paragraph 36
- (43) The Misogynistic Website Sting described in paragraph 36
- (44) The Baseless Court Case Sting described in paragraph 36
- (45) The Obsessive Compulsion Sting described in paragraph 36
- (46) The Bizarre Affidavits Sting described in paragraph 36
- (47) The Misogynistic Affidavits Sting described in paragraph 36

- (48) The Satanic Affidavits Sting described in paragraph 36
- (49) The MEK Friends at Fara News Sting described in paragraph 36
- (50) The Multiple Rulings for Harassment Sting described in paragraph 36
- (51) The Misogynistic Posts Sting described in paragraph 36
- (52) The Mental Illness Sting described in paragraph 36
- (53) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (54) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (55) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (56) The IRGC Court Case Lie Sting described in paragraph 36
- (57) The Expulsion Lie Sting described in paragraph 36
- (58) The Untrustworthiness Sting described in paragraph 36
- (59) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (60) The Selfish Sting described in paragraph 36
- (61) The Trotignon Stalking Sting described in paragraph 36
- (62) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

R. Defamatory Content: *JD3#005 Content*

published by: **John Doe 3, John Doe 1, John Doe 7, John Doe 10, Khorramshahi, X Corp.**, and, through agency, **Reza Pahlavi**

98. On or about February 26, 2024, **John Doe 3** and **X Corp.** published the content below concerning the plaintiff on one of **John Doe 3's X** account ("***JD3#005 Content***"), following which, on or about February 26, 2024, this same content was republished on **X** by **X Corp., John Doe 1, John Doe 3, John Doe 7, John Doe 10**, and **Khorramshahi. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access

to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

99. *JD3#005 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *JD3#005 Content*:

[@adam_hesabi:]

“Dear countless monarchist friends;”

‘Please under no circumstances threaten Masood Masjoody under his tweets.’

‘The news has reached that his immigration case is in trouble and in this fashion, he is looking for a way to save himself and stay. So please don't threaten him in any way. We are unlucky and this mosquito's death will be blamed on us. :)’

‘#Cult_of_the_Craze”

100. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD3#005 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Troubled Immigration Claim Sting described in paragraph 36.
- (2) The Lawsuits to Stay in Canada Sting described in paragraph 36.
- (3) The Regime Mercenary Sting described in paragraph 36.
- (4) The Liar Sting described in paragraph 36.
- (5) The Dying Mosquito Sting described in paragraph 36
- (6) The Cult Member Sting described in paragraph 36.
- (7) The Crazy Sting described in paragraph 36

S. Defamatory Content: *JD3#006 Content*

published by: **John Doe 3, John Doe 7, John Doe 10, X Corp.**, and, through agency, **Reza Pahlavi**

101. On or about February 26, 2024, December 30, 2023, in reply to *JD3#005 Content*, **John Doe 3, John Doe 7, John Doe 10** and **X Corp.** published the content below concerning the plaintiff on **X** ("**JD3#006 Content**"), following which, on or about February 26, 2024, this same content was republished by **X Corp.** on **X**. **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including republishings, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

102. *JD3#006 Content* is a public written conversation in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *JD3#006 Content*:

[Reply to JD3#006 Content by @atheistcyrus:]

"Masood Masjoody can easily get three or four refugee claims approved only with the photo we saw of him :) That photo in which a poor dog is sitting next to him and is having a stroke from fear! "

[Reply by @adam_hesabi:]

"He is severely depressed and under a lot of pressure. He doesn't even have a place to sleep and has to shower in other people's houses.'

'He is caught in a bad situation that has made him such a beggar :) "

[Reply by @atheistcyrus:]

"Does he shower? It is Unbelievable!"

[Reply by @adam_hesabi:]

"Only if he can access a shower, once a month :) "

[Reply to JD3#006 Content by @iranianpappppi3:]

“After all these years, this miserable wretch still couldn't find a place for himself to sleep, and I heard that he sleeps next to the garbage bins (#absolutely_serious).’

‘What do his ass-kissers want to achieve from him?!!!!’

103. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD3#005 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Troubled Immigration Claim Sting described in paragraph 36.
- (2) The Beggar Sting described in paragraph 36.
- (3) The Homeless Sting described in paragraph 36.
- (4) The Lacking Place to Sleep Sting described in paragraph 36.
- (5) The Miserable Wretch Sting described in paragraph 36.
- (6) The No Showering Sting described in paragraph 36.
- (7) The Showering Elsewhere Sting described in paragraph 36.
- (8) The Monthly Shower Sting described in paragraph 36.
- (9) The Animal Bully Sting described in paragraph 36.
- (10) The Sleeping by Garbage Sting described in paragraph 36.
- (11) The Dying Mosquito Sting described in paragraph 36.
- (12) The Untrustworthiness Sting described in paragraph 36
- (13) The Severe Depression Sting described in paragraph 36

T. Defamatory Content: *JD3#007 Content*

published by: **John Doe 3, X Corp.**, and, through agency, **Reza Pahlavi**

104. On or about March 4, 2024, **John Doe 3** and **X Corp.** published the content below concerning the plaintiff on one of **John Doe 3’s X** account (“***JD3#007 Content***”), following which, on or about February 26, 2024, this same content was republished

on by **X Corp.** on **X. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

105. *JD3#007 Content* constituted a Persian language text added to a crossed-out picture depicting the plaintiff next to another Iranian dissident, Ms. Shiva Amini. The following is a fair and accurate translation of the Persian language texts that constitute *JD3#007 Content*:

[@adam_hesabi:]

“No matter how badly I want to ignore these people, it is impossible. Just look at their heroes! One of them is a human trafficker and the Vancouver Cardboard Dweller and a rapist, and in this photo he may rape Shiva. The other [Shiva] is a person whose biggest act is an interview on Iran International TV and kicking Pahlavi, and she has also become an expert on penises. What a cunt story situation..))’

‘[Image: A crossed-out picture of the plaintiff next to Shiva Amini]’

106. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *JD3#007 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Human Trafficker Sting described in paragraph 36.
- (2) The Vancouver Cardboard Dweller Sting described in paragraph 36.
- (3) The Homeless Sting described in paragraph 36.
- (4) The Rapist Sting described in paragraph 36.
- (5) The Picture Rape Sting described in paragraph 36.
- (6) The Dishonourable Sting described in paragraph 36.

- (7) The Misogynist Sting described in paragraph 36.
- (8) The Charlatan Sting described in paragraph 36.
- (9) The Liar Sting described in paragraph 36

U. Defamatory Content: *JD4-5#001 Content*

published by: **John Doe 4, John Doe 1, John Doe 3, John Doe 5, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 11, John Doe 12, Lagertha, X Corp., Bahrami, Mirazimi**, and, through agency, **Reza Pahlavi**

107. On or about January 1, 2024, **John Doe 4, John Doe 5, and X Corp.** published the content below concerning the plaintiff on **John Doe 4** and **John Doe 5' X** accounts ("***JD4-5#001 Content***"), following which, on or about January 1, 2024, this same content was republished on **X** by **X Corp., John Doe 1, John Doe 3, John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 11, John Doe 12, Lagertha, Bahrami** and **Mirazimi. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

108. *JD4-5#001 Content* is in a Persian language post that quotes the Persian Language *JD3#001 Content*, and consists of both *JD3#001 Content*, by way of republication, and added text to it, including a public written conversation between **John Doe 4** and **John Doe 5**. The following is a fair and accurate translation of that Persian language added texts that *JD4-5#001 Content* included:

[@YaarDabestaani, quoting *JD3#001 Content*:]

"X User @adam_hesabi has written a series of tweets documenting the history of harassment by Masoud Masjoody, using public resources and links.'

‘Now, he wants to file a complaint against the Prince, @adam_hesabi, myself, @Aryammehr2, and anyone who retweeted it, to reveal our identities:)) ‘

‘New episode of the howls of the #Cult_of_the_Craze!’

‘I will repost the tweet threads for you to read.’

[@SmalBoy22:]

“Why not punish them for [the sake of] justice? Why don’t we create a team [for assassination] and have one? Why are they still alive? Let’s do something special if you want.”

[@SmalBoy22:]

“It should not be just verbal threats, we must also carry out bodily harm so that the rest of them would understand [the seriousness of our threats].”

109. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the added text within *JD4-5#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Extrajudicial Assassination Sting described in paragraph 36.
- (2) The Team for Bodily Harm and Assassination Sting described in paragraph 36.
- (3) The Deserves Death Sting described in paragraph 36.
- (4) The Beyond Redemption Sting described in paragraph 36.
- (5) The Harassment History Sting described in paragraph 36.
- (6) The Verified Harassment Case Sting described in paragraph 36.
- (7) The Dishonesty Sting described in paragraph 36.

- (8) The Fake Opposition Saint Sting described in paragraph 36.
- (9) The Revenge Tool Against Pahlavi Sting described in paragraph 36.
- (10) The Cult Member Sting described in paragraph 36.
- (11) The Crazy Sting described in paragraph 36

110. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the republication of *JD3#001 Content* within *JD4-5#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Bully Sting described in paragraph 36
- (2) The Charlatan Sting described in paragraph 36
- (3) The Disgraced Individual Sting described in paragraph 36
- (4) The Harasser Sting described in paragraph 36
- (5) The Liar Sting described in paragraph 36
- (6) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (7) The Misogynist Sting described in paragraph 36
- (8) The Fake Opposition Saint Sting described in paragraph 36
- (9) The Sexist Sting described in paragraph 36
- (10) The Sexual Abuser Sting described in paragraph 36
- (11) The Boundary Violator Sexist Sting described in paragraph 36
- (12) The Woman Abuser Sting described in paragraph 36
- (13) The Fake Opposition Tool Sting described in paragraph 36
- (14) The Harassing Messages to Trotignon Sting described in paragraph 36
- (15) The Misogyny Conviction Sting described in paragraph 36
- (16) The University Expulsion Blame Sting described in paragraph 36
- (17) The Defamation of Colleagues Sting described in paragraph 36

- (18) The MEK Disinformation Campaign Sting described in paragraph 36
- (19) The Hunger Strike Disguise described in paragraph 36
- (20) The Dishonesty Sting described in paragraph 36
- (21) The Dishonourable Sting described in paragraph 36
- (22) The University Dismissal for Obsession Sting described in paragraph 36
- (23) The Revenge Harassment Sting described in paragraph 36
- (24) The Ethical Dirtiness Sting described in paragraph 36
- (25) The SFU Administrative Expulsion Sting described in paragraph 36
- (26) The SFU Ethical Expulsion Sting described in paragraph 36
- (27) The SFU Harassment Expulsion Sting described in paragraph 36
- (28) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (29) The University Expulsion Sting described in paragraph 36
- (30) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (31) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (32) The Greed Sting described in paragraph 36
- (33) The Trotignon Harassment Sting described in paragraph 36
- (34) The University Bullying Sting described in paragraph 36
- (35) The Multiple Women Harassment Sting described in paragraph 36
- (36) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (37) The Misogynistic Tone Sting described in paragraph 36
- (38) The Online Harassment Order Sting described in paragraph 36
- (39) The Court Ruling for Women Harassment Sting described in paragraph 36
- (40) The Verified Harassment Case Sting described in paragraph 36

- (41) The Harassment History Sting described in paragraph 36
- (42) The Sexual Harassment History Sting described in paragraph 36
- (43) The Misogynistic Website Sting described in paragraph 36
- (44) The Baseless Court Case Sting described in paragraph 36
- (45) The Obsessive Compulsion Sting described in paragraph 36
- (46) The Bizarre Affidavits Sting described in paragraph 36
- (47) The Misogynistic Affidavits Sting described in paragraph 36
- (48) The Satanic Affidavits Sting described in paragraph 36
- (49) The MEK Friends at Fara News Sting described in paragraph 36
- (50) The Multiple Rulings for Harassment Sting described in paragraph 36
- (51) The Misogynistic Posts Sting described in paragraph 36
- (52) The Mental Illness Sting described in paragraph 36
- (53) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (54) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (55) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (56) The IRGC Court Case Lie Sting described in paragraph 36
- (57) The Expulsion Lie Sting described in paragraph 36
- (58) The Untrustworthiness Sting described in paragraph 36
- (59) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (60) The Selfish Sting described in paragraph 36
- (61) The Trotignon Stalking Sting described in paragraph 36
- (62) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

V. Defamatory Content: *JD12#001 Content*

published by: **John Doe 12, John Doe 1, John Doe 3, John Doe 4, John Doe 7, John Doe 11, Lagertha, Khorramshahi, Bahrami, Mirazimi, X Corp.**, and, through agency, **Reza Pahlavi**

111. On or about January 11, 2024, **John Doe 12** and **X Corp.** published the content below concerning the plaintiff on **John Doe 12's X** account ("***JD12#001 Content***"), following which, on or about January 11, 2024, this same content was republished on **X** by **X Corp., John Doe 1, John Doe 3, John Doe 4, John Doe 7, John Doe 11, John Doe 12, Lagertha, Khorramshahi, Bahrami, and Mirazimi. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including republishings, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

112. *JD12#001 Content* is in the English language that quotes *JD3#001 Content*, and consists of both *JD3#001 Content*, by way of republication, and added text to it. The following is the true and accurate copy of the added text that *JD12#001 Content* included:

[@YasiPatriot, quoting *JD3#001 Content*.]

“1- In this tweet thread, let's explore Masood Masjoody's character and past actions. This person made false claims against HIH Crown Prince **Reza Pahlavi** and anonymous Twitter accounts based on false allegations.’

‘Interestingly, women's rights defenders use people like Masjoody, with a history of sexually harassing women, to advance their goals with the slogan "woman, life, freedom"!’

‘You may have noticed that the opposition has found a new figure to spread false accusations against HIH Crown Prince Reza Pahlavi and his associates. Masood Masjoody has a particularly notable record.’

‘Let's dig into his file:’

‘#MasjoodyIsTerroristMEK’

‘#MEKterrorists’

[Image attached, including the plaintiff's profile picture]

‘2- The person you see in the photo below is who Masjoody harassed. Amélie Trotignon was Masjoody's classmate in the Ph.D. mathematics program at Simon Fraser University (SFU), Canada. What is the story?’

Both of them earned a Ph.D. degree in Mathematics from Simon Fraser University in 2019. They worked together in the Mathematics department as collaborators. In 2017, Amélie was accepted into a joint doctoral program between the French university François Rabelais and SFU. As a result, she regularly commuted between the two countries.

In April 2018, Masjoody drove Amélie to the airport as they had developed a friendly relationship in 2017 and 2018. During this time, Masjoody became interested in Amélie.

In the spring of 2019, when Amélie returned to Canada, Masjoody offered to pick her up from the airport once again. However, Amélie politely declined, telling him that the university had already arranged a taxi to pick her up. Masjoody was upset by this response and asked Amélie if they could talk about it. But Amélie explained that his repeated messages and insistence on picking her up from the airport made her uncomfortable. She kindly asked Masjoody to stop. ‘

‘This conversation was essentially the beginning of Amélie's harassment by Masjoody. After Amélie returned to SFU, Masjoody continuously sent her distressful messages, causing Amélie to

block his number in May 2019.'

'Masjoody started emailing and following Amélie around. He even waited outside her class and followed her on campus. Amélie returned to France in August 2019 and filed a complaint against Masjoody with the university's human rights office. The case was then closed. In April 2020, SFU's new Math department head terminated Masjoody, citing reasonable and fair reasons.'

'The human rights office tried to persuade Masjoody to respect Amélie's request to stop contacting her. Masjoody, dismissed from the university for failing to adhere to ethical and administrative regulations, including harassing a female colleague, defensively claimed his dismissal was due to protesting the influence of IRGC agents and filed a complaint, which was, of course, rejected.'

'Masjoody's harassment wasn't limited to Amélie. Judge Fitzpatrick's ruling states that Masjoody's harassment campaign against Amélie and two other female employees of the math department, named Mishna and Krupinski, intensified from October 2020 and continued for the next six months. According to Judge Fitzpatrick, Masjoody's tone in his posts in the fall of 2020/early 2021 regarding female professors and staff was completely misogynistic, and he gave them special derogatory names.'

'For example, he wrote about Mishna and Krupinski: "Fake feminists whose death would not sadden me." In January 2021, he sent emails to their employers and Amélie Trotignon's employer, engaging in defamation against them.'

'The ruling of the Supreme Court of British Columbia, also affirmed by the Court of Appeal, referred to his harassment campaign against his female colleagues.'

‘In upholding the British Columbia Supreme Court's ruling, an appeals court judge described Dr. Masjoody's affidavits and posts as "vicious," "outrageous," and "outright misogynistic."’

‘Link of his Court:’

‘canlii.org/en/bc/becsc/doc...’

‘#MasjoodyIsTerroristMEK’

‘#MEKterrorists’

‘3- Interestingly, at that time, Masjoody had disguised himself and was on a hunger strike, telling the media that his case was related to the influence of the IRGC. However, his case had essentially nothing to do with the IRGC issue.’

‘#MasjoodyIsTerroristMEK’

‘#MEKterrorists’

‘4- Fara News, managed by someone opposed to the Pahlavi family, is close to Vahid Beheshti and Don TV. Considering that Vahid Beheshti openly defended the Mujahedin-e Khalq Organization (MKO), it would not be surprising to say that this recent disinformation campaign, which seems to involve conflicting groups and individuals from **Masih Alinejad** against the HIH Crown Prince **Reza Pahlavi** and his team, is orchestrated by the MKO.’

Masjoody and his MEK/MKO friends with multiple mental illnesses who engage in deceitful and harassing behavior have been using their actions as a means of seeking revenge.’

‘#MasjoodyIsTerroristMEK’

‘#MEKterrorists’

‘5- I translate it from this tweet (X)”

[JD3#001 Content quoted]

113. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the added text within *JD12#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36
- (2) The False Claims Against Pahlavi Sting described in paragraph 36
- (3) The False Claims Against Twitter Accounts Sting described in paragraph 36
- (4) The False Accusations Sting described in paragraph 36
- (5) The Rapist Sting described in paragraph 36
- (6) The Terrorist Sting described in paragraph 36
- (7) The MEK Member Sting described in paragraph 36
- (8) The Funding from Alinejad Sting described in paragraph 36.
- (9) The Bully Sting described in paragraph 36
- (10) The Charlatan Sting described in paragraph 36
- (11) The Disgraced Individual Sting described in paragraph 36
- (12) The Harasser Sting described in paragraph 36
- (13) The Liar Sting described in paragraph 36
- (14) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (15) The Misogynist Sting described in paragraph 36
- (16) The Fake Opposition Saint Sting described in paragraph 36
- (17) The Sexist Sting described in paragraph 36
- (18) The Sexual Abuser Sting described in paragraph 36
- (19) The Boundary Violator Sexist Sting described in paragraph 36

- (20) The Woman Abuser Sting described in paragraph 36
- (21) The Fake Opposition Tool Sting described in paragraph 36
- (22) The Harassing Messages to Trotignon Sting described in paragraph 36
- (23) The Misogyny Conviction Sting described in paragraph 36
- (24) The University Expulsion Blame Sting described in paragraph 36
- (25) The Defamation of Colleagues Sting described in paragraph 36
- (26) The MEK Disinformation Campaign Sting described in paragraph 36
- (27) The Hunger Strike Disguise Sting described in paragraph 36
- (28) The Dishonesty Sting described in paragraph 36
- (29) The Dishonourable Sting described in paragraph 36
- (30) The University Dismissal for Obsession Sting described in paragraph 36
- (31) The Revenge Harassment Sting described in paragraph 36
- (32) The Ethical Dirtiness Sting described in paragraph 36
- (33) The SFU Administrative Expulsion Sting described in paragraph 36
- (34) The SFU Ethical Expulsion Sting described in paragraph 36
- (35) The SFU Harassment Expulsion Sting described in paragraph 36
- (36) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (37) The University Expulsion Sting described in paragraph 36
- (38) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (39) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (40) The Greed Sting described in paragraph 36
- (41) The Trotignon Harassment Sting described in paragraph 36
- (42) The University Bullying Sting described in paragraph 36
- (43) The Multiple Women Harassment Sting described in paragraph 36

- (44) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (45) The Misogynistic Tone Sting described in paragraph 36
- (46) The Online Harassment Order Sting described in paragraph 36
- (47) The Court Ruling for Women Harassment Sting described in paragraph 36
- (48) The Verified Harassment Case Sting described in paragraph 36
- (49) The Harassment History Sting described in paragraph 36
- (50) The Sexual Harassment History Sting described in paragraph 36
- (51) The Misogynistic Website Sting described in paragraph 36
- (52) The Baseless Court Case Sting described in paragraph 36
- (53) The Obsessive Compulsion Sting described in paragraph 36
- (54) The Bizarre Affidavits Sting described in paragraph 36
- (55) The Misogynistic Affidavits Sting described in paragraph 36
- (56) The Satanic Affidavits Sting described in paragraph 36
- (57) The MEK Friends at Fara News Sting described in paragraph 36
- (58) The Multiple Rulings for Harassment Sting described in paragraph 36
- (59) The Misogynistic Posts Sting described in paragraph 36
- (60) The Mental Illness Sting described in paragraph 36
- (61) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (62) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (63) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (64) The IRGC Court Case Lie Sting described in paragraph 36
- (65) The Expulsion Lie Sting described in paragraph 36
- (66) The Untrustworthiness Sting described in paragraph 36

- (67) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (68) The Selfish Sting described in paragraph 36
- (69) The Trotignon Stalking Sting described in paragraph 36

114. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the republication of *JD3#001 Content* within *JD12#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Bully Sting described in paragraph 36
- (2) The Charlatan Sting described in paragraph 36
- (3) The Disgraced Individual Sting described in paragraph 36
- (4) The Harasser Sting described in paragraph 36
- (5) The Liar Sting described in paragraph 36
- (6) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (7) The Misogynist Sting described in paragraph 36
- (8) The Fake Opposition Saint Sting described in paragraph 36
- (9) The Sexist Sting described in paragraph 36
- (10) The Sexual Abuser Sting described in paragraph 36
- (11) The Boundary Violator Sexist Sting described in paragraph 36
- (12) The Woman Abuser Sting described in paragraph 36
- (13) The Fake Opposition Tool Sting described in paragraph 36
- (14) The Harassing Messages to Trotignon Sting described in paragraph 36
- (15) The Misogyny Conviction Sting described in paragraph 36
- (16) The University Expulsion Blame Sting described in paragraph 36
- (17) The Defamation of Colleagues Sting described in paragraph 36
- (18) The MEK Disinformation Campaign Sting described in paragraph 36

- (19) The Hunger Strike Disguise described in paragraph 36
- (20) The Dishonesty Sting described in paragraph 36
- (21) The Dishonourable Sting described in paragraph 36
- (22) The University Dismissal for Obsession Sting described in paragraph 36
- (23) The Revenge Harassment Sting described in paragraph 36
- (24) The Ethical Dirtiness Sting described in paragraph 36
- (25) The SFU Administrative Expulsion Sting described in paragraph 36
- (26) The SFU Ethical Expulsion Sting described in paragraph 36
- (27) The SFU Harassment Expulsion Sting described in paragraph 36
- (28) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (29) The University Expulsion Sting described in paragraph 36
- (30) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (31) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (32) The Greed Sting described in paragraph 36
- (33) The Trotignon Harassment Sting described in paragraph 36
- (34) The University Bullying Sting described in paragraph 36
- (35) The Multiple Women Harassment Sting described in paragraph 36
- (36) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (37) The Misogynistic Tone Sting described in paragraph 36
- (38) The Online Harassment Order Sting described in paragraph 36
- (39) The Court Ruling for Women Harassment Sting described in paragraph 36
- (40) The Verified Harassment Case Sting described in paragraph 36
- (41) The Harassment History Sting described in paragraph 36

- (42) The Sexual Harassment History Sting described in paragraph 36
- (43) The Misogynistic Website Sting described in paragraph 36
- (44) The Baseless Court Case Sting described in paragraph 36
- (45) The Obsessive Compulsion Sting described in paragraph 36
- (46) The Bizarre Affidavits Sting described in paragraph 36
- (47) The Misogynistic Affidavits Sting described in paragraph 36
- (48) The Satanic Affidavits Sting described in paragraph 36
- (49) The MEK Friends at Fara News Sting described in paragraph 36
- (50) The Multiple Rulings for Harassment Sting described in paragraph 36
- (51) The Misogynistic Posts Sting described in paragraph 36
- (52) The Mental Illness Sting described in paragraph 36
- (53) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (54) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (55) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (56) The IRGC Court Case Lie Sting described in paragraph 36
- (57) The Expulsion Lie Sting described in paragraph 36
- (58) The Untrustworthiness Sting described in paragraph 36
- (59) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (60) The Selfish Sting described in paragraph 36
- (61) The Trotignon Stalking Sting described in paragraph 36
- (62) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

W. Defamatory Content: *JD7#001 Content*

published by: **John Doe 7, John Doe 3, Khorramshahi, X Corp.**, and, through agency, **Reza Pahlavi**

115. On or about January 11, 2024, **John Doe 7** and **X Corp.** published the content below concerning the plaintiff on **John Doe 7's X** account ("**JD7#001 Content**"), following which, on or about January 11, 2024, this same content was republished on **X** by **X Corp., John Doe 1, John Doe 3, John Doe 7, and Khorramshahi. Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

116. *JD7#001 Content* is a Persian language post quoting *JD3#001 Content*, and consists of both *JD3#001 Content*, by way of republication, and added text to it. The following is the true and fair translation of the added text that *JD7#001 Content* included, and a reply to that added text:

[@iranianpappppi3, quoting *JD3#001 Content*:]

“Friends! This was the tweet thread that led Masood Masjoody to file a complaint against 11 anonymous users and request the judge to pressure Twitter to reveal our private information!”

‘Additionally, he accused Reza Shah II of directing a Twitter gang to pressure others.’

‘I ask my friends to spare some time and translate this tweet thread into any language they know, then tweet it themselves and send me the link via direct message so I can retweet it.’

‘All the information disclosed in this tweet thread has been public and does not include private information that would justify legal complaints or lead to the suspension of an account.’

‘Please carry this out if you can.’

‘Thank you.’

[reply by @YasiPatriot:]

“I will do it in a few hours if no one helps.”

117. In its *natural* and ordinary meaning or, in the alternative, by way of innuendo or implication, the added text within *JD07#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The False Claims Against Pahlavi Sting described in paragraph 36.
- (2) The Liar Sting described in paragraph 36.
- (3) The Revenge Tool Against Pahlavi Sting described in paragraph 36.
- (4) The Fake Opposition Tool Sting described in paragraph 36.
- (5) The Baseless Court Case Sting described in paragraph 36.
- (6) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

118. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the republication of *JD3#001 Content* within *JD7#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Bully Sting described in paragraph 36
- (2) The Charlatan Sting described in paragraph 36
- (3) The Disgraced Individual Sting described in paragraph 36
- (4) The Harasser Sting described in paragraph 36
- (5) The Liar Sting described in paragraph 36
- (6) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (7) The Misogynist Sting described in paragraph 36
- (8) The Fake Opposition Saint Sting described in paragraph 36
- (9) The Sexist Sting described in paragraph 36

- (10) The Sexual Abuser Sting described in paragraph 36
- (11) The Boundary Violator Sexist Sting described in paragraph 36
- (12) The Woman Abuser Sting described in paragraph 36
- (13) The Fake Opposition Tool Sting described in paragraph 36
- (14) The Harassing Messages to Trotignon Sting described in paragraph 36
- (15) The Misogyny Conviction Sting described in paragraph 36
- (16) The University Expulsion Blame Sting described in paragraph 36
- (17) The Defamation of Colleagues Sting described in paragraph 36
- (18) The MEK Disinformation Campaign Sting described in paragraph 36
- (19) The Hunger Strike Disguise described in paragraph 36
- (20) The Dishonesty Sting described in paragraph 36
- (21) The Dishonourable Sting described in paragraph 36
- (22) The University Dismissal for Obsession Sting described in paragraph 36
- (23) The Revenge Harassment Sting described in paragraph 36
- (24) The Ethical Dirtiness Sting described in paragraph 36
- (25) The SFU Administrative Expulsion Sting described in paragraph 36
- (26) The SFU Ethical Expulsion Sting described in paragraph 36
- (27) The SFU Harassment Expulsion Sting described in paragraph 36
- (28) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (29) The University Expulsion Sting described in paragraph 36
- (30) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (31) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (32) The Greed Sting described in paragraph 36
- (33) The Trotignon Harassment Sting described in paragraph 36

- (34) The University Bullying Sting described in paragraph 36
- (35) The Multiple Women Harassment Sting described in paragraph 36
- (36) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (37) The Misogynistic Tone Sting described in paragraph 36
- (38) The Online Harassment Order Sting described in paragraph 36
- (39) The Court Ruling for Women Harassment Sting described in paragraph 36
- (40) The Verified Harassment Case Sting described in paragraph 36
- (41) The Harassment History Sting described in paragraph 36
- (42) The Sexual Harassment History Sting described in paragraph 36
- (43) The Misogynistic Website Sting described in paragraph 36
- (44) The Baseless Court Case Sting described in paragraph 36
- (45) The Obsessive Compulsion Sting described in paragraph 36
- (46) The Bizarre Affidavits Sting described in paragraph 36
- (47) The Misogynistic Affidavits Sting described in paragraph 36
- (48) The Satanic Affidavits Sting described in paragraph 36
- (49) The MEK Friends at Fara News Sting described in paragraph 36
- (50) The Multiple Rulings for Harassment Sting described in paragraph 36
- (51) The Misogynistic Posts Sting described in paragraph 36
- (52) The Mental Illness Sting described in paragraph 36
- (53) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (54) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (55) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (56) The IRGC Court Case Lie Sting described in paragraph 36

- (57) The Expulsion Lie Sting described in paragraph 36
- (58) The Untrustworthiness Sting described in paragraph 36
- (59) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (60) The Selfish Sting described in paragraph 36
- (61) The Trotignon Stalking Sting described in paragraph 36
- (62) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

X. Defamatory Content: *JD7#002 Content*

published by: **John Doe 7, X Corp., John Doe 3, John Doe 12, Lagertha, Khorramshahi, Mirazimi**, and, through agency, **Reza Pahlavi**

119. On or about January 11, 2024, **John Doe 7** and **X Corp.** published the content below concerning the plaintiff on **John Doe 7's X** account ("***JD7#002 Content***"), following which, on or about January 11, 2024, this same content was republished on **X** by **X Corp., John Doe 3, John Doe 7, John Doe 12, Lagertha, Khorramshahi**, and **Mirazimi**. **Reza Pahlavi** is a publisher of this content through agency. All of these publications, including re-publications, were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

120. *JD7#002 Content* is a Persian language content quoting *JD12#001 Content*, which quotes *JD3#001 content*. *JD7#002 Content* consists of both of *JD12#001 Content* and *JD3#001 Content*, by way of republication, and added text to the former. The following is a fair and accurate translation of that Persian language added texts that *JD7#002 Content* included, and two replies to that added text:

[@iranianpappppi3, quoting *JD12#001 Content* and *JD3#001 Content*.]

"One of my dear followers took the time to translate the original tweet by **@adam_hesabi** into English.'

‘@YasiPatriot also worked on it and turned the English translation into a nice tweet thread, carefully placing the pictures and links.’

‘(I’ve included the original tweet here as well; please take five minutes to read it.)’

‘We don’t have the dirty money of the Islamic Republic that reaches us through the MEK.’

‘We don’t have support from the #Cult_of_the_Craze and their army of abusers and fabricators.’

‘We don’t have the support of the regime’s intelligence-security agents who are spread across Europe and America, rushing to help their own forces in situations like this.’

‘We don’t have expensive lawyers, who are self-serving and traitors, willing to work for us for free.’

‘We can’t even afford to hire a regular #lawyer to show up for a single session to defend us in court.’

‘But...’

‘There is one factor we have that, because of its presence, even having all the above won’t defeat us.’

‘What factor?’

‘#Good_Friends’

‘Yes! We have plenty of good, committed, and loyal friends.’

‘Last night, I tweeted asking for someone to translate the original tweet into any language they know (preferably English).’

‘An hour later, a young lady sent me this direct message:’

“Here’s the translation, dear @iranianpappppi3.’

‘By the way, if you need help on computer-related or administrative matters, let me know. I enjoy helping you stand up to these people.’”

‘Now, tell me, what force can defeat this will, solidarity, and unity?’

“‘I truly say, how wonderful it is that we have each other.’”

[reply by @Maryam_Lagerta:]

‘Greetings to all truth-tellers [heart emoji]

‘#LongLiveTheShah’

[reply by @iranianpappppi3:]

‘Long live [heart emoji, followed by flower emoji]”

121. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the added text within *JD07#002 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Fake Opposition Tool Sting described in paragraph 36.
- (2) The Liar Sting described in paragraph 36.
- (3) The Harasser Sting described in paragraph 36.
- (4) The Dishonesty Sting described in paragraph 36.
- (5) The Terrorist Sting described in paragraph 36.
- (6) The MEK Member Sting described in paragraph 36.
- (7) The Funding from Alinejad Sting described in paragraph 36.
- (8) The MEK Disinformation Campaign Sting described in paragraph 36.
- (9) The Revenge Tool Against Pahlavi Sting described in paragraph 36.
- (10) The Cult Member Sting described in paragraph 36.
- (11) The Crazy Sting described in paragraph 36.
- (12) The Ethical Dirtiness Sting described in paragraph 36.

- (13) The Charlatan Sting described in paragraph 36.
- (14) The Disgraced Individual Sting described in paragraph 36.
- (15) The Baseless Court Case Sting described in paragraph 36.
- (16) The Regime Thug Sting described in paragraph 36.
- (17) The Regime Intelligence Association Sting described in paragraph 36.
- (18) The Shiite Mercenary Sting described in paragraph 36.
- (19) The Regime Mercenary Sting described in paragraph 36
- (20) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

122. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the republication of *JD12#001 Content* within *JD7#002 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36
- (2) The False Claims Against Pahlavi Sting described in paragraph 36
- (3) The False Claims Against Twitter Accounts Sting described in paragraph 36
- (4) The False Accusations Sting described in paragraph 36
- (5) The Rapist Sting described in paragraph 36
- (6) The Terrorist Sting described in paragraph 36
- (7) The MEK Member Sting described in paragraph 36
- (8) The Funding from Alinejad Sting described in paragraph 36.
- (9) The Bully Sting described in paragraph 36
- (10) The Charlatan Sting described in paragraph 36
- (11) The Disgraced Individual Sting described in paragraph 36

- (12) The Harasser Sting described in paragraph 36
- (13) The Liar Sting described in paragraph 36
- (14) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (15) The Misogynist Sting described in paragraph 36
- (16) The Fake Opposition Saint Sting described in paragraph 36
- (17) The Sexist Sting described in paragraph 36
- (18) The Sexual Abuser Sting described in paragraph 36
- (19) The Boundary Violator Sexist Sting described in paragraph 36
- (20) The Woman Abuser Sting described in paragraph 36
- (21) The Fake Opposition Tool Sting described in paragraph 36
- (22) The Harassing Messages to Trotignon Sting described in paragraph 36
- (23) The Misogyny Conviction Sting described in paragraph 36
- (24) The University Expulsion Blame Sting described in paragraph 36
- (25) The Defamation of Colleagues Sting described in paragraph 36
- (26) The MEK Disinformation Campaign Sting described in paragraph 36
- (27) The Hunger Strike Disguise Sting described in paragraph 36
- (28) The Dishonesty Sting described in paragraph 36
- (29) The Dishonourable Sting described in paragraph 36
- (30) The University Dismissal for Obsession Sting described in paragraph 36
- (31) The Revenge Harassment Sting described in paragraph 36
- (32) The Ethical Dirtiness Sting described in paragraph 36
- (33) The SFU Administrative Expulsion Sting described in paragraph 36
- (34) The SFU Ethical Expulsion Sting described in paragraph 36
- (35) The SFU Harassment Expulsion Sting described in paragraph 36

- (36) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (37) The University Expulsion Sting described in paragraph 36
- (38) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (39) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (40) The Greed Sting described in paragraph 36
- (41) The Trotignon Harassment Sting described in paragraph 36
- (42) The University Bullying Sting described in paragraph 36
- (43) The Multiple Women Harassment Sting described in paragraph 36
- (44) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (45) The Misogynistic Tone Sting described in paragraph 36
- (46) The Online Harassment Order Sting described in paragraph 36
- (47) The Court Ruling for Women Harassment Sting described in paragraph 36
- (48) The Verified Harassment Case Sting described in paragraph 36
- (49) The Harassment History Sting described in paragraph 36
- (50) The Sexual Harassment History Sting described in paragraph 36
- (51) The Misogynistic Website Sting described in paragraph 36
- (52) The Baseless Court Case Sting described in paragraph 36
- (53) The Obsessive Compulsion Sting described in paragraph 36
- (54) The Bizarre Affidavits Sting described in paragraph 36
- (55) The Misogynistic Affidavits Sting described in paragraph 36
- (56) The Satanic Affidavits Sting described in paragraph 36
- (57) The MEK Friends at Fara News Sting described in paragraph 36
- (58) The Multiple Rulings for Harassment Sting described in paragraph 36

- (59) The Misogynistic Posts Sting described in paragraph 36
- (60) The Mental Illness Sting described in paragraph 36
- (61) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (62) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (63) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (64) The IRGC Court Case Lie Sting described in paragraph 36
- (65) The Expulsion Lie Sting described in paragraph 36
- (66) The Untrustworthiness Sting described in paragraph 36
- (67) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (68) The Selfish Sting described in paragraph 36
- (69) The Trotignon Stalking Sting described in paragraph 36

123. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the republication of *JD3#001 Content* within *JD7#002 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Bully Sting described in paragraph 36
- (2) The Charlatan Sting described in paragraph 36
- (3) The Disgraced Individual Sting described in paragraph 36
- (4) The Harasser Sting described in paragraph 36
- (5) The Liar Sting described in paragraph 36
- (6) The Revenge Tool Against Pahlavi Sting described in paragraph 36
- (7) The Misogynist Sting described in paragraph 36
- (8) The Fake Opposition Saint Sting described in paragraph 36
- (9) The Sexist Sting described in paragraph 36
- (10) The Sexual Abuser Sting described in paragraph 36

- (11) The Boundary Violator Sexist Sting described in paragraph 36
- (12) The Woman Abuser Sting described in paragraph 36
- (13) The Fake Opposition Tool Sting described in paragraph 36
- (14) The Harassing Messages to Trotignon Sting described in paragraph 36
- (15) The Misogyny Conviction Sting described in paragraph 36
- (16) The University Expulsion Blame Sting described in paragraph 36
- (17) The Defamation of Colleagues Sting described in paragraph 36
- (18) The MEK Disinformation Campaign Sting described in paragraph 36
- (19) The Hunger Strike Disguise described in paragraph 36
- (20) The Dishonesty Sting described in paragraph 36
- (21) The Dishonourable Sting described in paragraph 36
- (22) The University Dismissal for Obsession Sting described in paragraph 36
- (23) The Revenge Harassment Sting described in paragraph 36
- (24) The Ethical Dirtiness Sting described in paragraph 36
- (25) The SFU Administrative Expulsion Sting described in paragraph 36
- (26) The SFU Ethical Expulsion Sting described in paragraph 36
- (27) The SFU Harassment Expulsion Sting described in paragraph 36
- (28) The SFU Expulsion for Trotignon Harassment Sting described in paragraph 36
- (29) The University Expulsion Sting described in paragraph 36
- (30) The Harassment and Bullying Expulsion Sting described in paragraph 36
- (31) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36
- (32) The Greed Sting described in paragraph 36
- (33) The Trotignon Harassment Sting described in paragraph 36
- (34) The University Bullying Sting described in paragraph 36

- (35) The Multiple Women Harassment Sting described in paragraph 36
- (36) The Addressed and Rejected as Baseless Claims Sting described in paragraph 36
- (37) The Misogynistic Tone Sting described in paragraph 36
- (38) The Online Harassment Order Sting described in paragraph 36
- (39) The Court Ruling for Women Harassment Sting described in paragraph 36
- (40) The Verified Harassment Case Sting described in paragraph 36
- (41) The Harassment History Sting described in paragraph 36
- (42) The Sexual Harassment History Sting described in paragraph 36
- (43) The Misogynistic Website Sting described in paragraph 36
- (44) The Baseless Court Case Sting described in paragraph 36
- (45) The Obsessive Compulsion Sting described in paragraph 36
- (46) The Bizarre Affidavits Sting described in paragraph 36
- (47) The Misogynistic Affidavits Sting described in paragraph 36
- (48) The Satanic Affidavits Sting described in paragraph 36
- (49) The MEK Friends at Fara News Sting described in paragraph 36
- (50) The Multiple Rulings for Harassment Sting described in paragraph 36
- (51) The Misogynistic Posts Sting described in paragraph 36
- (52) The Mental Illness Sting described in paragraph 36
- (53) The BCCA Bizarre Posts Ruling Sting described in paragraph 36
- (54) The BCCA Misogynistic Posts Ruling Sting described in paragraph 36
- (55) The BCCA Satanic Posts Ruling Sting described in paragraph 36
- (56) The IRGC Court Case Lie Sting described in paragraph 36
- (57) The Expulsion Lie Sting described in paragraph 36

- (58) The Untrustworthiness Sting described in paragraph 36
- (59) The Neglecting Trotignon's Rights Sting described in paragraph 36
- (60) The Selfish Sting described in paragraph 36
- (61) The Trotignon Stalking Sting described in paragraph 36
- (62) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.

Y. Defamatory Content: *Minachi#001 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

124. On or about January 30, 2024, **Minachi** and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#001 Content***"). **Reza Pahlavi** is a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

125. The following is the true and accurate copy of *Minachi#001 Content*:

[**@SedighehMinachi:**]

"we are not intimidated by this questionable guy. I was one of the people who helped him a lot and then found out that unfortunately, I was fooled by his fictitious and manipulative stories. Please take care of yourself, and continue with your struggle against the brutal Islamists"

126. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#001 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Liar Sting described in paragraph 36.
- (2) The Manipulative Sting described in paragraph 36.

- (3) The Dishonesty Sting described in paragraph 36.
- (4) The Charlatan Sting described in paragraph 36.

Z. Defamatory Content: *Minachi#002 Content*

published by: **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi**

127. On or about February 13, 2024, **Minachi, Kamancheh, Lagertha**, and, through agency, **Reza Pahlavi** published the content below concerning the plaintiff via the Mission Channel on **Telegram** (“***Minachi#002 Content***”). This publication was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

128. *Minachi#002 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language text that constitute *Minachi#002 Content*:

[Sedigheh Minachi:]

“I've heard that this charlatan, Haj Hamed [**Hamed Esmaeilion**], is one of the reformists who, especially during the appointment of Mullah Rouhani, encouraged Iranians in Toronto to participate in the regime's elections. All these reformists and regime charlatans try to get close to all groups abroad, and wherever they go, their goal is to create division and discord. That googooli who deceived some of us last year by falsely claiming that his hunger strike launched a campaign against the **IRGC**, used to say until last year that he did not approve of Haj Agha's character because, on his recommendation, the Trudeau government refrained from listing the IRGC as a terrorist group. But now, this little googooli has openly become one of Haj Agha's ardent followers and is very, very busy with court and immigration office.”

129. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#002 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Charlatan Sting described in paragraph 36.
- (2) The Manipulative Sting described in paragraph 36.
- (3) The IRGC Court Case Lie Sting described in paragraph 36.
- (4) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36.
- (5) The Fake Opposition Tool Sting described in paragraph 36.
- (6) The Greed Sting described in paragraph 36.
- (7) The Shiite Mercenary Sting described in paragraph 36.
- (8) The Troubled Immigration Claim Sting described in paragraph 36.
- (9) The Reformist Branch Sting described in paragraph 36.
- (10) The Liar Sting described in paragraph 36.
- (11) The Regime Mercenary Sting described in paragraph 36.
- (12) The Submissive Gay Man Sting described in paragraph 36.
- (13) The Sexually Abused as a Child Sting described in paragraph 36.

AA. Defamatory Content: *Minachi#003 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

130. On or about February 18, 2024, **Minachi** and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#003 Content***"). **Reza Pahlavi** is a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

131. *Minachi#003 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language text that constitute *Minachi#003 Content*:

[@SedighehMinachi:]

“I named him Googooli Pepsi-chi. In his psychopathic world, he thought that we were going to go into hiding now. This misogynist little man’s asylum application is still in the air and yet he is throwing shitty bullshit at us.”

132. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#003 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Submissive Gay Man Sting described in paragraph 36.
- (2) The Sexually Abused as a Child Sting described in paragraph 36.
- (3) The Pepsi Bottle Sting described in paragraph 36.
- (4) The Psychopath Sting described in paragraph 36.
- (5) The Misogynistic Little Man Sting described in paragraph 36.
- (6) The Troubled Immigration Claim Sting described in paragraph 36.
- (7) The Liar Sting described in paragraph 36.
- (8) The Misogynist Sting described in paragraph 36.
- (9) The Deportation Sting described in paragraph 36

BB. Defamatory Content: *Minachi#004 Content*

published by: **Minachi**, and, through agency, **Reza Pahlavi**

133. On or about February 18, 2024, **Minachi** published the content below concerning the plaintiff on **Minachi**’s public **Facebook** account (“***Minachi#004 Content***”). **Reza Pahlavi** is a publisher of this content through agency. This publication was made to all individuals with access to the Internet content, including viewers and readers in

British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

134. *Minachi#004 Content* is in the Persian language and accompanied a purported picture of the plaintiff seated in a face mask next to a dog (the “Masked with Dog Image”). The following is a fair and accurate translation of the Persian-language text that constitutes *Minachi#004 Content*:

[Sedi Minachi:]

“This is the same disgraced charlatan who in 2023, with his so-so hunger strike, tricked us all into supporting his googooli work. Unfortunately, due to the high consumption of Imam Hosseini's gheymeh, he is harassing and bullying the citizens of Canada and the United States, the judicial system and the government of Canada. His refugee application is still up in the air, but instead of dealing with his incurable illness, he continues to play his impudent games and has taken the brazenness to the highest level. Now, do you understand why such googooli Pepsi-chis have been sent to Canada? In this photo, googooli dressed himself in such a frightful way to show his bullying even to a pet.’

[reply from defendant **Azar Khorramshahi:**]

‘What a country has Canada become [+two emojis].’

[reply from **Sedi Minachi:**]

‘Indeed, the number of people like this googooli is increasing every day in Canada.’

[reply by **Nazy Kalviri**, liked by defendant **Minachi:**]

‘Psycho’

135. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#004 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Disgraced Individual Sting described in paragraph 36.
- (2) The Charlatan Sting described in paragraph 36.
- (3) The Hunger Strike Disguise Sting described in paragraph 36.
- (4) The Hunger Strike Trick Sting described in paragraph 36.
- (5) The Submissive Gay Man Sting described in paragraph 36.
- (6) The Sexually Abused as a Child Sting described in paragraph 36.
- (7) The Pepsi Bottle Sting described in paragraph 36.
- (8) The Shiite Mercenary Sting described in paragraph 36.
- (9) The Harasser Sting described in paragraph 36.
- (10) The Bully Sting described in paragraph 36.
- (11) The Animal Bully Sting described in paragraph 36.
- (12) The Government Harassment Sting described in paragraph 36.
- (13) The Troubled Immigration Claim Sting described in paragraph 36.
- (14) The Incurable Illness Sting described in paragraph 36.
- (15) The Manipulative Sting described in paragraph 36.
- (16) The Ethical Dirtiness Sting described in paragraph 36.
- (17) The Selfish Sting described in paragraph 36.
- (18) The Mental Illness Sting described in paragraph 36.
- (19) The Psychopath Sting described in paragraph 36.

CC. Defamatory Content: *Minachi#005 Content*

published by: **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi**

136. On or about February 18, 2024, **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi** published the content below concerning the plaintiff via the Mission Channel on **Telegram** ("**Minachi#005 Content**"). This publications was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

137. *Minachi#005 Content* is a Persian language post quoting *Minachi#004 Content*, and consists of both *Minachu#004 Content*, by way of republication, and added text to it. The following is the true and fair translation of the added text that *Minachi#005 Content* included:

[Sedi Minachi:]

"Good morning friends. The reason why I am sharing this post with you here is to show that this creature's bullying has even reached domestic animals. In this photo from last year, he had dressed himself in this way to, as he said, scare my dogs. Should we be wiser?!"

138. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the added text within *Minachi#005 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Animal Bully Sting described in paragraph 36.
- (2) The Bully Sting described in paragraph 36.

139. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the republication of *Minachi#004 Content* within *Minachi#005 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Disgraced Individual Sting described in paragraph 36.
- (2) The Charlatan Sting described in paragraph 36.

- (3) The Hunger Strike Disguise Sting described in paragraph 36.
- (4) The Hunger Strike Trick Sting described in paragraph 36.
- (5) The Submissive Gay Man Sting described in paragraph 36.
- (6) The Sexually Abused as a Child Sting described in paragraph 36.
- (7) The Pepsi Bottle Sting described in paragraph 36.
- (8) The Shiite Mercenary Sting described in paragraph 36.
- (9) The Harasser Sting described in paragraph 36.
- (10) The Bully Sting described in paragraph 36.
- (11) The Animal Bully Sting described in paragraph 36.
- (12) The Government Harassment Sting described in paragraph 36.
- (13) The Troubled Immigration Claim Sting described in paragraph 36.
- (14) The Incurable Illness Sting described in paragraph 36.
- (15) The Manipulative Sting described in paragraph 36.
- (16) The Ethical Dirtiness Sting described in paragraph 36.
- (17) The Selfish Sting described in paragraph 36.
- (18) The Mental Illness Sting described in paragraph 36.
- (19) The Psychopath Sting described in paragraph 36.

DD. Defamatory Content: *Minachi#006 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

140. On or about February 18, 2024, **Minachi** and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#006 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

141. *Minachi#006 Content* is in the Persian language and accompanies the Masked with Dog Image. The following is a fair and accurate translation of the Persian-language text that constitutes *Minachi#006 Content*:

[@**SedighehMinachi**:]

“This is the same googooli, who in 2023, with his so-so hunger strike and his campaign for consuming Imam Hossein’s gheymeh, is continuing to harass and abuse Canadian citizens, judges and the government. He has been in Canada for 14 years, his asylum status is still up in the air. Instead of treating his mashangi, he has become more impudent than the day before...”

‘Now can you guess why he was exported abroad?’

[reply from X user, @Seyed..., liked by **Minachi**:]

‘It is clear that Masjoody is a sex worker in women's clothes at night and files lawsuits during the day!!’

142. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#006 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Submissive Gay Man Sting described in paragraph 36.
- (2) The Sexually Abused as a Child Sting described in paragraph 36.
- (3) The Shiite Mercenary Sting described in paragraph 36.
- (4) The Ethical Dirtiness Sting described in paragraph 36.
- (5) The Dishonesty Sting described in paragraph 36.
- (6) The Hunger Strike Trick Sting described in paragraph 36.
- (7) The Bully Sting described in paragraph 36.
- (8) The Animal Bully Sting described in paragraph 36.
- (9) The Selfish Sting described in paragraph 36.

- (10) The Troubled Immigration Claim Sting described in paragraph 36.
- (11) The Incurable Illness Sting described in paragraph 36.
- (12) The Mental Illness Sting described in paragraph 36.
- (13) The Government Harassment Sting described in paragraph 36.
- (14) The Sex Worker Sting described in paragraph 36.

EE. Defamatory Content: *Minachi#007 Content*

published by: **Minachi, John Doe 1, X Corp.**, and, through agency, **Reza Pahlavi**

143. On or about February 18, 2024, **Minachi, John Doe 1, and X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#006 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

144. *Minachi#007 Content* is a public written conversation in the Persian language in reply to a public post by **John Doe 1** including the Masked with Dog Image. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#007 Content*:

[@Kasrakarimi3:]

"This little man is an animal abuser.'

[@SedighehMinachi:]

'This is the same charlatan who has been bullying everyone for a while and his shit-throwing has hit him right in his face and his leader, Ali [Khamenei, Iran's dictator], The Handicapped.'

'Now can you guess why he was exported abroad?'"

145. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#007 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Animal Bully Sting described in paragraph 36.
- (2) The Charlatan Sting described in paragraph 36.
- (3) The Bully Sting described in paragraph 36.
- (4) The Disgraced Individual Sting described in paragraph 36.
- (5) The Liar Sting described in paragraph 36.
- (6) The Revenge Tool Against Pahlavi Sting described in paragraph 36.
- (7) The Regime Thug Sting described in paragraph 36.

FF. Defamatory Content: *Minachi#008 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

146. On or about February 19, 2024, **Minachi** and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#008 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

147. *Minachi#008 Content* is in the Persian. The following is a fair and accurate translation of the Persian-language text that constitutes *Minachi#008 Content*:

[@**SedighehMinachi**:]

"This person is not Canadian and received an inadmissibility letter for his refugee application from the IRB [Canada's Immigration and Refugee Board] a few months ago. He is probably in limbo right now."

148. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#008 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Troubled Immigration Claim Sting described in paragraph 36.
- (2) The IRB Inadmissibility Letter Sting described in paragraph 36.
- (3) The Liar Sting described in paragraph 36.
- (4) The Untrustworthiness Sting described in paragraph 36.
- (5) The Deportation Sting described in paragraph 36

GG. Defamatory Content: *Minachi#009 Content*

published by: **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi**

149. On or about February 19, 2024, **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi** published the content below concerning the plaintiff via the Mission Channel on **Telegram** ("***Minachi#009 Content***"). This publications was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

150. *Minachi#009 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#009 Content*:

[Sedigheh Minachi:]

"This googooli chick was premeditatedly sent [by the Islamic republic] here as an international student immediately after the defeat of the 88 [Green] Movement. We still do not know whether he entered SFU with the [former Islamic president] Ahmadinejad government's scholarship or through another means. According to him, he started his PhD in 2010 and finished it in 2019. He was never a university professor and in the last semesters of his studies, he was allowed to teach sessional as an instructor. I think that after

finishing his PhD, he worked as a math instructor at SFU for only one semester, when they fired him for his obsession with a French international student. We all know the rest of the story and how we were deceived by the story of two IRGC nuclear scientists at SFU. According to the research I conducted in May 2023, he was a member of the Islamic Association of Polytechnic University and was also a staunch supporter of Mirhossein Mousavi and Karroubi in the Green Movement. When I asked him in the same month of May, he confirmed that yes, he was a member of the university's Islamic Association and an activist of the reformists.'

'I think he applied for asylum in 2020 and in May 2023 he received a letter saying that his asylum application may be inadmissible. Maybe he got a rejection letter from the asylum office and with these ridiculous complaints, he is buying time for himself to show off and to stay in suspension in this country for a longer period of time with open court cases.'

151. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#009 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Submissive Gay Man Sting described in paragraph 36.
- (2) The Sexually Abused as a Child Sting described in paragraph 36.
- (3) The Troubled Immigration Claim Sting described in paragraph 36.
- (4) The Premeditated Student Sting described in paragraph 36.
- (5) The SFU Harassment Expulsion Sting described in paragraph 36.
- (6) The Trotignon Harassment Sting described in paragraph 36.
- (7) The IRB Inadmissibility Letter Sting described in paragraph 36.
- (8) The Islamic Association Membership Sting described in paragraph 36.
- (9) The Reformist Activist Sting described in paragraph 36.

- (10) The Reformist Branch Sting described in paragraph 36.
- (11) The Deception Sting described in paragraph 36.
- (12) The Charlatan Sting described in paragraph 36.
- (13) The Liar Sting described in paragraph 36.
- (14) The Untrustworthiness Sting described in paragraph 36.
- (15) The Regime Missionary Sting described in paragraph 36.
- (16) The University Dismissal for Obsession Sting described in paragraph 36.
- (17) The University Expulsion Blame Sting described in paragraph 36.
- (18) The University Expulsion Sting described in paragraph 36.
- (19) The Regime Payments Sting described in paragraph 36.

HH. Defamatory Content: *Minachi#010 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

152. On or about February 19, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#010 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

153. *Minachi#010 Content* is in the Persian language in reply to a public post including the Masked with Dog Image. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#010 Content*:

[**@SedighehMinachi:**]

"This dishonourable person is not Canadian. In 2010, he was sent to Vancouver as an international student, and his asylum application might still be in limbo."

154. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#010 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Dishonourable Sting described in paragraph 36.
- (2) The Troubled Immigration Status Sting described in paragraph 36.
- (3) The Exported Abroad Sting described in paragraph 36.
- (4) The Deportation Sting described in paragraph 36

II. Defamatory Content: *Minachi#011 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

155. On or about February 20, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#011 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

156. *Minachi#011 Content* is in the Persian language in reply to a public post including the Masked with Dog Image. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#011 Content*:

[@SedighehMinachi:]

"This dishonourable person wanted to scare my oppressed dogs."

157. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#011 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Dishonourable Sting described in paragraph 36.
- (2) The Animal Bullying Sting described in paragraph 36

JJ. Defamatory Content: *Minachi#012 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

158. On or about February 22, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#012 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

159. *Minachi#012 Content* is in the Persian language in reply to a public post about a former nomination candidate for the Conservative Party of Canada. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#012 Content*:

[@SedighehMinachi:]

"Maschoosi announced his support for this candidate yesterday on his X account. Now everyone understands where the issue of foreign government interference originated from."

160. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#012 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Dishonourable Sting described in paragraph 36.
- (2) The Foreign Government Interference Sting described in paragraph 36.
- (3) The Regime Mercenary Sting described in paragraph 36.
- (4) The Regime Agents Association Sting described in paragraph 36.
- (5) The Regime Lobbyist Sting described in paragraph 36.
- (6) The Farty Insult Sting described in paragraph 36.

KK. Defamatory Content: *Minachi#013 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

161. On or about February 27, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("**Minachi#013 Content**"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

162. *Minachi#013 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#013 Content*:

[**@SedighehMinachi:**]

"Farty is cyberbullying, spreading lies and harassing activists against the terrorist republic with fake accounts. Because he has a history of harassment and the Canadian government is aware of his history of cooperation with the regime's organs, his asylum application has been rejected."

163. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#013 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Asylum Claim Rejection Sting described in paragraph 36.
- (2) The Troubled Immigration Status Sting described in paragraph 36.
- (3) The Deportation Sting described in paragraph 36
- (4) The Collaboration with Regime Known to Canadian Government Sting described in paragraph 36.
- (5) The Regime Mercenary Sting described in paragraph 36.
- (6) The Regime Agents Association Sting described in paragraph 36.
- (7) The Ministry of Intelligence Association Sting described in paragraph 36.

- (8) the Crimes Intensification Sting described in paragraph 36.
- (9) The Regime's Ministry of Intelligence Member Sting described in paragraph 36.
- (10) The Fake Opposition Saint Sting described in paragraph 36.
- (11) The Bully Sting described in paragraph 36.
- (12) The Liar Sting described in paragraph 36.
- (13) The Harasser Sting described in paragraph 36.
- (14) The Fary Insult Sting described in paragraph 36.

LL. Defamatory Content: *Minachi#014 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

164. On or about March 9, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#014 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

165. *Minachi#014 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#014 Content*:

[@**SedighehMinachi**:]

"By the way, how is it that these loose-shit and shit-faced offsprings of the mullahs know googooli Dr. Farty who was thrown to Vancouver? I mean the one who went on that hunger strike last year. Do they share a father or do they share a mother?"

166. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#014 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Submissive Gay Man Sting described in paragraph 36.
- (2) The Sexually Abused as a Child Sting described in paragraph 36.
- (3) The Hunger Strike Disguise Sting described in paragraph 36.
- (4) The Child of a Mullah Sting described in paragraph 36.
- (5) The Cleric Association to Evade Legal Consequences Sting described in paragraph 36.
- (6) The Fary Insult Sting described in paragraph 36.

MM. Defamatory Content: *Minachi#015 Content*

published by: **Minachi**, and, through agency, **Reza Pahlavi**

167. On or about March 10, 2024, the defendant, **Sedigheh Minachi**, made oral statements concerning the plaintiff to a resident of Vancouver other than the plaintiff, herein referred to as “Mr. M.” **Minachi** made these statements, herein referred to as “***Minachi#015 Content***”, during a phone call she initiated. **Reza Pahlavi** is also a publisher of *Minachi#015 Content* through agency.

168. *Minachi#015 Content* included the following false and defamatory statements:

- (1) That, claiming to be a medical interpreter, **Minachi** claimed she accessed the plaintiff's BC medical records and falsely purported that the plaintiff was hospitalized in a psychiatric hospital two years prior, implying the plaintiff suffers from mental instability or illness;
- (2) That the plaintiff is an agent of the Islamic Republic regime sent to Canada, thereby accusing the plaintiff of affiliation with a terrorist regime and disloyalty to the community.

169. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#015 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Psychiatric Hospitalization Sting described in paragraph 36.
- (2) The Psychopath Sting described in paragraph 36.

- (3) The Incurable Illness Sting described in paragraph 36.
- (4) The Mentally Disturbed Sting described in paragraph 36.
- (5) The Regime Agents Association Sting described in paragraph 36.
- (6) The Regime Mercenary Sting described in paragraph 36.
- (7) The Regime's Canada Placement Sting described in paragraph 36.

NN. Defamatory Content: *Minachi#016 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

170. On or about March 12, 2024, **Minachi** and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#016 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

171. *Minachi#016 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language text that constitutes *Minachi#016 Content*:

[@**SedighehMinachi**:]

"Do you mean to say that all of them are [Iran's regime's] intelligence officers who are comrades and colleagues of Farty who started a hunger strike against the Canadian judicial system last year?"

172. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#016 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Ministry of Intelligence Association Sting described in paragraph 36.
- (2) The Regime's Ministry of Intelligence Member Sting described in paragraph 36.

- (3) The Regime Mercenary Sting
- (4) The IRGC Court Case Lie Sting
- (5) The Hunger Strike Disguise Sting
- (6) The Fary Insult Sting described in paragraph 36.

OO. Defamatory Content: *Minachi#017 Content*

published by: **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi**

173. On or about March 26, 2024, **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi** published the content below concerning the plaintiff via the Mission Channel on **Telegram** (“***Minachi#017 Content***”). This publications was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

174. *Minachi#017 Content* is a public written conversation in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#017 Content*:

[Sedigheh Minachi:]

“Hello, friends in this group. If anyone knows about the past of this exotic person in Iran, I would be grateful if you could contact me privately. Hanif and Maryam Moghaddam knew this creature from Iran, but for some reason, they have not revealed anything yet.’

‘Subversive fighters and supporters of the movement to return to the proud reign of Prince Reza Pahlavi [defendant, Reza Pahlavi] are not affected by the bullying and harassment of questionable cyber-chicks and are not afraid. Rather, they continue their struggle with more determination and seriousness until the overthrow of the fascist and reactionary regime of the Islamic Republic. Friends, we need your help and support in this long journey. We will keep you

updated in the coming weeks. ‘Now can you guess why he was exported abroad?’

[Maryam Lagertha:]

“Really, I would like to know about his past, to see what kind of creature he is and on what table he has eaten bread.’ ‘He made us all suffer, but we are still there and we will not be silenced until we blind his eyes.”

175. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#017 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Bully Sting described in paragraph 36.
- (2) The Harasser Sting described in paragraph 36.
- (3) The Monarchist Subversion Sting described in paragraph 36.
- (4) The Regime Mercenary Sting described in paragraph 36.
- (5) The Dishonesty Sting described in paragraph 36.

PP. Defamatory Content: *Minachi#018 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

176. On or about March 26, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi’s X** account (“***Minachi#018 Content***”). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

177. *Minachi#018 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#018 Content*:

[@SedighehMinachi:]

“They sent one of their purest losers, along with their top loincloth-wearing bosses [a jab at those who can’t afford to cover themselves] to Vancouver just to bully and harass Canada’s judicial system. Any day now, his dear mother will be at the airport, hugging and kissing him and his suitcases as he’s sent off to Hasan Kiadeh village [a small village, north of Iran] [double face with tears of joy emoji].”

178. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#018 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Regime Mercenary Sting described in paragraph 36.
- (2) The Regime’s Ministry of Intelligence Member Sting described in paragraph 36.
- (3) The Bully Sting described in paragraph 36.
- (4) The Harasser Sting described in paragraph 36.
- (5) The Regime Thug Sting described in paragraph 36.
- (6) The Deportation Sting described in paragraph 36.
- (7) The Villager Mother Sting described in paragraph 36.

QQ. Defamatory Content: *Minachi#019 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

179. On or about March 29, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi’s X** account (“*Minachi#019 Content*”). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and

readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

180. *Minachi#019 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#019 Content*:

[@SedighehMinachi:]

"One of the thugs of the [Islamic Republic's] regime is currently living in Vancouver and in his wild imagination, he is making legal cases against the monarchists. His cock's tail has been sticking out for a long time and he has become a joke for everyone"

181. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#019 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Regime Mercenary Sting described in paragraph 36.
- (2) The Regime Thug Sting described in paragraph 36.
- (3) The World's Joke Sting described in paragraph 36.
- (4) The Court Process Abuse Sting described in paragraph 36.
- (5) The Psychopath Sting described in paragraph 36.

RR. Defamatory Content: *Minachi#020 Content*

published by: **Minachi, Lagertha, Khorramshahi, X Corp.**, and, through agency, **Reza Pahlavi**

182. On or about March 31, 2024, **Minachi, Lagertha, Khorramshahi** and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#020 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

183. *Minachi#020 Content* is a public written conversation in the Persian language between **Minachi**, **Khorramshahi** and **Lagertha**. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#020 Content*.

[@Maryam_Lagertha:]

‘I didn't know this person, I saw that he tweeted about me, now, why dis this idiot lock his account and block me after he slandered me, and I questioned him and asked him for documents, two weeks passed and I questioned him again, where his documents were ‘

‘Beware of this psychopath @VatanParastan’

‘#Identifying_mercenaries’

‘#exported_mercenary’

[@SedighehMinachi:]

‘I think he is hospitalized alongside that psychopath who constantly produces comedic lawsuits.’

184. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#020 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Mercenary Sting
- (2) The Regime Mercenary Sting
- (3) The Psychiatric Hospitalization Sting
- (4) The Psychopath Sting described in paragraph 36.
- (5) The Psychopathic Friend Sting described in paragraph 36.
- (6) The Harasser Sting described in paragraph 36.
- (7) The Court Process Abuse Sting described in paragraph 36.

SS. Defamatory Content: *Minachi#021 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

185. On or about March 31, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#021 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

186. *Minachi#021 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#021 Content*:

[**@SedighehMinachi:**]

"There is a mashang in the city of Vancouver who has a special mission on behalf of Jannati to constantly produce mass and comedic complaints against subversives. Until last year, he was accusing Qomikala [Iranian- American activist, Masih Alinejad] of making up fake scenarios for his kidnapping plan, and he was also accusing Esmailioon [Hamed Esmailioon] of being opportunistic and ambitious!' '#Long_Live_Iran"

187. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#021 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Jannati Mission Sting described in paragraph 36.
- (2) The Regime Leaders' Association Sting described in paragraph 36.
- (3) The Regime Leader Abroad Sting described in paragraph 36.
- (4) The Court Process Abuse Sting described in paragraph 36.
- (5) The Mental Illness Sting described in paragraph 36.

- (6) The Funding from Alinejad Sting described in paragraph 36.
- (7) The Manipulative Sting described in paragraph 36.

TT. Defamatory Content: *Minachi#022 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

188. On or about March 31, 2024, **Minachi, John Doe 1**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#022 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

189. *Minachi#022 Content* is a public written conversation in the Persian language between **Minachi** and **John Doe 1**. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#022 Content*:

[**@Kasrakarimi3:**]

"Good morning Mr. Vahid [Beheshti]."

"Mr. Vahid?"

"So when do you want to answer the people of Iran about your lies?"

[**@SedighehMinachi:**]

"This guy has a psychopathic friend in our city, who had a secret plan to eat lamb head soup together last year"

190. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#022 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Mental Illness Sting described in paragraph 36.
- (2) The Dishonesty Sting described in paragraph 36.
- (3) The Psychopath Sting described in paragraph 36.

- (4) The Psychopathic Friend Sting described in paragraph 36.
- (5) The Liar Sting described in paragraph 36.

UU. Defamatory Content: *Minachi#023 Content*

published by: **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi**

191. On or about April 24, 2024, **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi** published the content below concerning the plaintiff via the Mission Channel on **Telegram** ("***Minachi#023 Content***"), following which, on or about April 24, 2024, the Mission member, **Shirin Yadegari** alongside **Maryam Lagertha, Arash Kamancheh**, and, through agency, **Reza Pahlavi** republished the screenshots of the same content from X via the Mission Channel. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

192. *Minachi#023 Content* is a republication through the Mission Channel of a Persian language X post originally published on the account of **@mehdi117** on X (formerly **Twitter**), owned and operated by an individual named **Mehdi Ahmadzaedh**. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#023 Content*:

[Sedigheh Minachi:]

"Explanations for the people of Iran;

to uncover the true nature of Masood Masjoody!"

'#Cult_of_The_Craze'

'#Iran_is_our_temple'

'#Pahlavi_The_Hope_of_the_Nation'

'#Death_to_three_corrupt_groups_Mullahs_Leftists_MEK'

'@SunLight__White @hs_maryam'

'@azarkhorramsha1 @Maryam_Lagertha'

'@Kasrakarimi3 @sepiedhia'

'@ArashKamancheh7'

'@YaarDabestaani @adam_hesabi'

'Greetings to the noble people of Iran,'

'I, Mehdi Ahmadzadeh, consider it my human and national duty to inform you about some truths regarding an individual name Masood Masjoody.'

'1- In February 2023, M.M. began a hunger strike in Vancouver, claiming it was a political protest to demand that the IRGC be designated as a terrorist entity, coinciding with **Vahid Beheshti's** hunger strike. Later, we found out that this hunger strike was actually in protest against his conviction in court for harassing two women. M.M. collected public donations through this political display and also managed to gain the support and trust of myself and other Vancouver activists.'

'2- After some time, I realized **M.M.** had initiated multiple baseless complaints against mainly nationalist political activists living in Canada, established suspicious connections with known sympathizers of the **MEK** in Vancouver, and started irrational hostilities against monarchists. All of this indicated that he was collaborating with **MEK** sympathizers, who also offered collaboration to me and some others. As a result, I became distrustful of him and repeatedly expressed my opposition.'

'3- Some of the individuals who consistently support **M.M.'s** posts and his nonsense had a meeting with me and other activists from Vancouver in December 2023. They said if we wanted a share in Iran's future politics, we should join them alongside the **MEK**. We

clearly stated that cooperating with this terrorist group is a red line for us, and we will never collaborate with them.'

'4- Last Friday, **M.M.**, through someone named "**Mahi Etminan**", requested a meeting with me. I set the condition that a lawyer must be present and that he must withdraw his baseless complaints, which he, of course, refused, so no meeting took place.'

'5- Despite my activities and clarifications against the **MEK**, **M.M.**, who has a history of recording people's voices for extortion, used my voice message to produce a message where the voice is mine, but the words are not. Today, I obtained similar software and generated a voice that I will post on social media, subject to my lawyer's discretion, to prove that such a thing is possible and that **M.M.** is being supported by an active cyber team.'

'6- With this fabricated voice, **M.M.** has tried to pretend that I am his close friend, collaborator, or advisor, while I absolutely do not align with his actions. My support for him, like that of other Vancouver activists, was initially merely to support the struggles of the Iranian people, and later only out of sympathy and humanitarian concern.'

'7- There is evidence for all my claims in this post, which I will publish if necessary and also present to the court. I wrote this explanation in the hope that such clarifications will help identify frauds and opportunists—individuals who, for the sake of being noticed and in the hopes of gaining power and wealth after the fall of the Islamic Republic, are inflaming the current political atmosphere and, through deception, diverting the noble and suffering Iranian people's struggles. To the disgrace of Iran's enemies, and for victory and freedom; for the triumph of light over darkness.'

'Long live Iran'

‘April 2024 / Ordibehesht 1403 Solar [Hijri]’

‘Mehdi Ahmadzadeh”

193. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#023 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Hunger Strike Disguise Sting described in paragraph 36.
- (2) The Hunger Strike Trick Sting described in paragraph 36.
- (3) The IRGC-Irrelevant Hunger Strike Sting described in paragraph 36.
- (4) The Sexual Harassment Conviction Sting described in paragraph 36.
- (5) The Sexual Harassment History Sting described in paragraph 36.
- (6) The Sexual Abuser Sting described in paragraph 36.
- (7) The Baseless Court Case Sting described in paragraph 36.
- (8) The Court Process Abuse Sting described in paragraph 36.
- (9) The MEK Member Sting described in paragraph 36.
- (10) The MEK Sympathizer Sting described in paragraph 36.
- (11) The MEK Disinformation Campaign Sting described in paragraph 36.
- (12) The Cyber Team Collaboration Sting described in paragraph 36.
- (13) The Fabricated Evidence Sting described in paragraph 36.
- (14) The Political Opportunism Sting described in paragraph 36
- (15) The Extortion Sting described in paragraph 36.
- (16) The Voice Manipulation Sting described in paragraph 36.
- (17) The Manipulative Sting Sting described in paragraph 36.
- (18) The Dishonesty Sting described in paragraph 36.
- (19) The Monarchist Subversion Sting described in paragraph 36.

- (20) The Disinformation Campaign Against Pahlavi Team Sting described in paragraph 36.
- (21) The Cult Member Sting described in paragraph 36.
- (22) The Corruption Sting described in paragraph 36.
- (23) The Crazy Sting described in paragraph 36.
- (24) The Disgraceful Sting described in paragraph 36.
- (25) The Beyond Redemption Sting described in paragraph 36.
- (26) The Extrajudicial Assassination Sting described in paragraph 36.
- (27) The Deserves Death Sting described in paragraph 36.

VV. Defamatory Content: *Minachi#024 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

194. On or about May 6, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#024 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

195. *Minachi#024 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#024 Content*:

[**@SedighehMinachi:**]

"Does anyone know if this mule-like IRGC terrorist has any friendship or connection with our city's well-known professional complainant?"

196. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#024 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Professional Complainer Sting described in paragraph 36.
- (2) The IRGC Member Sting described in paragraph 36.
- (3) The IRGC Employment Sting described in paragraph 36.
- (4) The Terrorist Sting described in paragraph 36.
- (5) The Regime Agents Association Sting described in paragraph 36.

WW. Defamatory Content: *Minachi#025 Content*

published by: **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi**

197. On or about May 18, 2024, **Minachi, Kamancheh, Lagertha** and, through agency, **Reza Pahlavi** published the content below concerning the plaintiff via the Mission Channel on **Telegram** (“*Minachi#025 Content*”). This publications was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

198. *Minachi#025 Content* is a public written conversation in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#025 Content*:

[Mission member, **Maria**:]

“[text on picture: Khamenei's thought-provoking and surprising words:]

‘Khamenei's important message to Iranians abroad’

‘Come to Iran and endure the punishment given to you by the law (execution or imprisonment, etc.) to save yourself from divine punishment!!!’

‘Have you ever seen such a smart and kind-hearted leader?’

‘He says, come back from abroad so that we will execute you’

‘Come for punishment’

[Sedigheh Minachi:]

‘I know a cave-dwelling MEK cub who is listening to his commander and is packing his bags for Iran.’

‘But aside from the joke, documents have come out that this troublesome MEK cub and professional complainer has applied for his Iranian passport.’

199. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#025 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Professional Complainer Sting described in paragraph 36.
- (2) Khamenei Association Sting described in paragraph 36.
- (3) The Iranian Passport Application Sting described in paragraph 36.
- (4) The Regime Mercenary Sting described in paragraph 36.
- (5) The MEK Member Sting described in paragraph 36.
- (6) The Cave-Dwelling MEK Cub Sting described in paragraph 36.
- (7) The Homeless Sting described in paragraph 36.

XX. Defamatory Content: *Minachi#026 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

200. On or about May 18, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi’s X** account (“*Minachi#026 Content*”). **Reza Pahlavi** is also a publisher of this content through agency. These publications were

made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

201. *Minachi#026 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#026 Content*:

[@SedighehMinachi:]

"This guy is the complete opposite of the schizophrenic complainant in our town. Because this one has gone from suits and ties to cave-dwelling and is constantly receiving divine revelations."

202. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#026 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Schizophrenic Sting described in paragraph 36.
- (2) The Professional Complainer Sting described in paragraph 36.
- (3) The Homeless Sting described in paragraph 36.
- (4) The Mental Illness Sting described in paragraph 36.

YY. Defamatory Content: *Minachi#027 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

203. On or about May 19, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#027 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

204. *Minachi#027 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#027 Content*:

[@**SedighehMinachi**:]

"This exported mashang's psychosis is many times higher than it was on Thursday. He takes free money from the Canadian government, he begs for free food, he takes money from people with lies and extortion, and he intensifies his crimes 24 hours a day by slandering, fantasizing, and harassing the irreconcilable opponents of the regime on social media"

[reply from @**SedighehMinachi**:]

"Does anyone know his drug provider in Vancouver?"

205. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#027 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Mental Illness Sting described in paragraph 36.
- (2) The Extortion Sting described in paragraph 36.
- (3) The Crimes Intensification Sting described in paragraph 36.
- (4) The Harasser Sting described in paragraph 36.
- (5) The Baseless Complaints Sting described in paragraph 36.
- (6) The Beggar Sting described in paragraph 36.
- (7) The Liar Sting described in paragraph 36.
- (8) The Dishonesty Sting described in paragraph 36.
- (9) The Drug Addiction Sting described in paragraph 36.

ZZ. Defamatory Content: *Minachi#028 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

206. On or about May 20, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#028 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

207. *Minachi#028 Content* is in the Persian language and include a picture of Ahmad Jannati with some text on it. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#028 Content*:

[**@SedighehMinachi:**]

"Because Jannati knows that mashang Khan will get an answer tomorrow from the court, he sent him a message that he is coming to Vancouver by helicopter to accompany him and then take him with him and hand him over to his mother so that they can eat halva together.'

[Text on the attached picture of Jannati:] You only sit down and eat this and that person's halva [at their funerals]'

[**@SedighehMinachi:**]

"Of course, this joke was related to the last moments of Monday.'

[**@SedighehMinachi:**]

'At the same time, Jannati is bringing the Iranian passport that mashang Khan secretly ordered some time ago, so he can rush to visit his dear mother as soon as possible, otherwise, his delusions will increase and he will end up in Gaza.'

208. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#028 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Regime Leaders' Association Sting described in paragraph 36.
- (2) The Jannati Mission Sting described in paragraph 36.
- (3) The Mental Illness Sting described in paragraph 36.
- (4) The Terrorist Sting described in paragraph 36.
- (5) The Iranian Passport Application Sting described in paragraph 36.
- (6) The Regime's Canada Placement Sting described in paragraph 36.
- (7) The Regime Mercenary Sting described in paragraph 36.
- (8) The Regime Leader Abroad Sting described in paragraph 36.
- (9) The Villager Mother Sting described in paragraph 36.

AAA. Defamatory Content: *Minachi#029 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

209. On or about May 23, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#029 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

210. *Minachi#029 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#029 Content*:

[**@SedighehMinachi:**]

"The guy himself knows he has no case, and all his frivolous complaints are the same. His only intention is to harass people and waste the court's time and processes. Stay tuned for positive and good news—it just takes time!"

211. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#029 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Harassment History Sting described in paragraph 36.
- (2) Court Process Abuse Sting described in paragraph 36.
- (3) The Professional Complainer Sting described in paragraph 36.

BBB. Defamatory Content: *Minachi#030 Content*

published by: **Minachi, X Corp.**, and, through agency, **Reza Pahlavi**

212. On or about May 23, 2024, **Minachi**, and **X Corp.** published the content below concerning the plaintiff on **Minachi's X** account ("***Minachi#030 Content***"). **Reza Pahlavi** is also a publisher of this content through agency. These publications were made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and were viewed, read, and republished by others in British Columbia and elsewhere.

213. *Minachi#030 Content* is in the Persian language. The following is a fair and accurate translation of the Persian language texts that constitute *Minachi#030 Content*:

[**@SedighehMinachi:**]

" If Jannati and Toosi don't airlift him out of here with a helicopter, he knows very well where he'll legally end up over time."

214. In its natural and ordinary meaning or, in the alternative, by way of innuendo or implication, *Minachi#030 Content* meant and was understood in context to mean and convey the following false and defamatory imputations concerning the plaintiff:

- (1) The Cleric Association to Evade Legal Consequences Sting described in paragraph 36.
- (2) The Sexually Abused as a Child Sting described in paragraph 36.
- (3) The Child Sexual Abuser Association Sting described in paragraph 36.
- (4) The Regime Leaders' Association Sting described in paragraph 36.
- (5) The Regime Leader Abroad Sting described in paragraph 36.
- (6) The Regime Mercenary Sting described in paragraph 36.
- (7) The Jannati Mission Sting described in paragraph 36.

CCC. Damages

215. As a result of the civil conspiracy between and among the individual defendants, including the sustained defamation, vilification, and harassment campaign by the individual defendants, sustained, facilitated, and promoted by the defendant X Corp., the plaintiff suffered significant harm and damages, including damages to his reputation in British Columbia and elsewhere; severe emotional distress, humiliation, and anxiety; and threats to his personal safety and well-being, including threats of assassination and other bodily harm, hindering his ability to participate in political, public and professional activities.

216. As a result of defamatory publications by each and everyone of the defendants, as described herein, the plaintiff has suffered harms to his reputation in British Columbia and elsewhere, and has been exposed to hatred, ridicule, and contempt. These publications have injured the plaintiff in respect of his character and calling and reputation, caused him distress and fear for his and his relatives' safety.

DDD. Express Malice and Punitive, Special, and Aggravated Damages

217. All defendants were actuated by express malice in publishing defamatory and harassing statements referenced herein.

218. The defendants published defamatory and harassing statements with the predominant purpose of harming the plaintiff's reputation, safety, activism, and ability to participate in public discourse.
219. The defendants failed or refused to publish an apology.
220. The defendants failed or refused to retract or take down the defamatory and harassing publications described herein.
221. The defendants continued to publish defamatory and harassing content concerning the plaintiff even after receiving notice of this action.
222. The defendants invited and encouraged others to post similar defamatory and harassing content concerning the plaintiff, compounding the harm caused.
223. The defendants published and continued to publish defamatory content of and concerning the plaintiff with the knowledge that the imputations conveyed by this content was false.
224. The defendants, including X Corp., continued publication of defamatory and harassing content of and concerning the plaintiff after a Court order was issued ordering removal of defamatory content from X and prohibiting several defendants from publishing directly or indirectly, any content relating to the plaintiff.
225. The defendant X Corp. persistently refused to take down defamatory and harassing content concerning the plaintiff from X, instead continuing to promote, amplify, and facilitate such content, despite numerous requests from the plaintiff predating this action and the commencement of these proceedings.
226. The defendant X Corp. continues to publish explicit threats of violence and assassination targeting the plaintiff, as communicated by other defendants and affiliates of Pahlavi.
227. The plaintiff will rely on the entire conduct of the individual defendants and X Corp. before and after the commencement of this action and to the date of the trial of this matter.

228. The malicious, high-handed, and callous conduct of the defendants, both individually and collectively, demonstrates a flagrant disregard for the rights and safety of the plaintiff. This conduct warrants an award of special, aggravated, and punitive, damages to punish the defendants appropriately and deter such actions in the future.

Part 2: RELIEF SOUGHT

1. A declaration that each of the defendants, including X Corp., has defamed the plaintiff by publishing one or more defamatory stings described herein.
2. A declaration that the individual defendants have committed a predominant purpose civil conspiracy against the plaintiff.
3. A declaration that the individual defendants have committed an unlawful means civil conspiracy against the plaintiff.
4. A declaration that all defendants, including X Corp., are jointly and severally liable for the harm caused through the individual defendants' conspiracy as outlined herein.
5. A declaration that all defendants, including X Corp., are jointly and severally liable for the harm caused to the plaintiff through their collective defamatory publications on X or elsewhere on the Internet through X, collectively disseminating all of the false and defamatory sting described in paragraph 36 of Part 1 herein.
6. An interim, interlocutory, and permanent injunction restraining all of the defendants, , from publishing, causing the publication of, or instructing the publication of, any defamatory, harassing, or threatening statements concerning the plaintiff.
7. General damages in defamation and conspiracy in the amount of \$10,000,000.
8. Special damages in defamation and conspiracy in the amount of \$10,000,000.
9. Aggravated damages in defamation and conspiracy in the amount of \$10,000,000.
10. Punitive damages in defamation and conspiracy in the amount of \$20,000,000.
11. Special costs incurred by the plaintiff to address threats, harassment, and reputational damage arising from the actions of the defendants.

12. Interest pursuant to the Court Order Interest Act.

13. Such further and other relief as this Honourable Court may deem just and equitable.

Part 3: LEGAL BASIS

1. The plaintiff relies on the statutory and common law in regard to conspiracy and injurious falsehood.
2. The plaintiff relies on the statutory and common law in regard to defamation, including libel and slander.
3. The plaintiff relies on common law principles governing the assessment of damages for defamation and conspiracy.
4. The plaintiff relies on the common law doctrine of joint and several liability.
5. The plaintiff relies on common law and equitable principles concerning injunctive relief for defamation and harassment.
6. The plaintiff also relies on the Libel and Slander Act, RSBC 1996 c. 263.
7. The plaintiff pleads and relies on the doctrine of respondeat superior and further pleads that Reza Pahlavi and X Corp. are liable to the plaintiff for the acts, omissions, deeds, misdeeds, torts, and liabilities of their own as well as those of their agents, officers, directors, contractors, sub-contractors, servants, employees, assignees, appointees and partners.
8. In addition to publishing and continuing to publish the impugned words against the plaintiff, X Corp. is liable to the plaintiff for promoting and facilitating the defamatory and harassing publications, including threats, public incitement of hatred, and wilful promotion of hatred.
9. X Corp. is jointly with the other defendants and severally liable for the damages caused by the individual defendants' conspiracy, as it knowingly or recklessly facilitated the dissemination and amplification of the defamatory and harassing content published by the individual defendants. Despite actual and constructive

knowledge of the conspiratorial and unlawful nature of these publications, X Corp. failed to take reasonable steps to remove or mitigate them and instead has promoted and continued to facilitate them.

10. The defendants' publications are defamatory: They clearly tend to lower the plaintiff's reputation; they refer to the plaintiff; and they were published to at least one person other than the applicant- indeed, they were and still are published worldwide.

11. In their natural and ordinary meaning or, in the alternative, by way of innuendo or implication, the impugned words were not and are not true, were and are defamatory, and were made maliciously in the expectation of causing serious injury to the reputation of the plaintiff.

Information About Service

Plaintiff's address for service: 2503-9603 Manchester Dr., Burnaby, BC, V3N 4Y7

Email address for service: info@desislamiserlescours.com

Place of trial: 800 Smithe Street, Vancouver, British Columbia

The address of the registry is: 800 Smithe Street, Vancouver, British Columbia

Date: 20/Dec/2024
[dd/mm/yyyy]



Signature of

☒ Plaintiff

☐ Lawyer for
plaintiff(s)

Masood Masjoody

Rule 7-1 (1) of the Supreme Court Civil Rules states:

(1) Unless all parties of record consent or the court otherwise orders, each party of record to an action must, within 35 days after the end of the pleading period,

(a) prepare a list of documents in Form 22 that lists

(i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and

(ii) all other documents to which the party intends to refer at trial, and (b) serve the list on all parties of record.

APPENDIX

Part 1: CONCISE SUMMARY OF NATURE OF CLAIM:

Damages for the publication of a defamatory article by the defendants

Part 2: THIS CLAIM ARISES FROM THE FOLLOWING:

- | | |
|---|---|
| <input type="checkbox"/> a motor vehicle accident | <input type="checkbox"/> investment losses |
| <input type="checkbox"/> medical malpractice | <input type="checkbox"/> the lending of money |
| <input checked="" type="checkbox"/> another cause | <input type="checkbox"/> an employment relationship |
| <input type="checkbox"/> contaminated sites | <input type="checkbox"/> a will or other issues concerning the probate of an estate |
| <input type="checkbox"/> construction defects | <input checked="" type="checkbox"/> a matter not listed here |
| <input type="checkbox"/> real property (real estate) | <input type="checkbox"/> the provision of goods or services or other general commercial matters |
| <input checked="" type="checkbox"/> personal property | |

Part 3: THIS CLAIM INVOLVES:

- | | |
|--|---|
| <input type="checkbox"/> a class action | <input type="checkbox"/> conflict of laws |
| <input type="checkbox"/> maritime law | <input checked="" type="checkbox"/> none of the above |
| <input type="checkbox"/> aboriginal law | <input type="checkbox"/> do not know |
| <input checked="" type="checkbox"/> constitutional law | |

Part 4: Enactments

- | | |
|--|---|
| <input type="checkbox"/> Builders Lien Act | <input type="checkbox"/> Motor Vehicle Act |
| <input checked="" type="checkbox"/> Court Order Interest | <input type="checkbox"/> Occupiers Liability Act |
| <input type="checkbox"/> Insurance (Motor Vehicle) Act | <input checked="" type="checkbox"/> Supreme Court Act |
| <input type="checkbox"/> Insurance (Vehicle) Act | <input type="checkbox"/> Wills Variation Act |
| | <input type="checkbox"/> Other: |