

SUPREME COURT  
OF BRITISH COLUMBIA  
VANCOUVER REGISTRY

SEP 03 2025

## FORM 1

Original Filed September 16, 2024

Amended Filed March 28, 2025, Pursuant to Rule 6-1(1)(a)

Further Amended Pursuant to the Court's Order dated September 2, 2025

No. S-246401  
Vancouver Registry

*In the Supreme Court of British Columbia*

Between

MASOOD MASJOODY

Plaintiff

and

REZA PAHLAVI, MEHDI AHMADZADEH, SEDIGHEH MINACHI, AZAR  
KHORRAMSHAHI, MEHDI HAJATI, AVIDEH MOTMAEN-FAR, X CORP., and ~~JOHN  
DOE #1 to JOHN DOE #10~~ JOHN DOE #1, JOHN DOE #2, JOHN DOE #3, JOHN DOE  
#4, JOHN DOE #5, JOHN DOE #6, JOHN DOE #7, JOHN DOE #8, AREZOU SOLTANI,  
and CANADIAN IRANIAN WAKUPERS FOUNDATION

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, Mehdi Hajati, Avidah Motmaen-Far, X Corp., John Doe #1, John Doe #2, John Doe #3, John Doe #4, John Doe #5, John Doe #6, John Doe #7, and John Doe #8**

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**

1. The Plaintiff, **Dr. Masood Masjoody**, is an independent researcher holding a Ph.D. in Mathematics and other degrees, residing in British Columbia. He is also a veteran pro-democracy activist and dissident of the Islamist regime ruling Iran. Over several years, **Dr. Masjoody** has actively participated in political efforts to expose agents and enablers of that regime in Canada, garnering significant attention from those opposing his views.

## 2. The Defendants:

- **Reza Pahlavi**, a former crown prince residing in Maryland, USA, has a significant following of supporters who engage in cyberattacks and harassment campaigns targeting pro-democracy Iranian activists in British Columbia and elsewhere. Pahlavi has admitted both past and ongoing connections with the **Islamic Revolutionary Guard Corps** ("IRGC"), a designated terrorist entity in Canada. While Pahlavi's direct involvement in the actions against the Plaintiff may not be fully established, he is vicariously liable for the conduct of his supporters, office, affiliates, advisors, and others acting under his influence. Their actions against the Plaintiff align with his broader political objectives sought through political violence.
- **Mehdi Ahmadzadeh**, the owner of Caspian Stonework Ltd. in North Vancouver, British Columbia, and also a member of a group named "~~Canadian Iranian Wake uppers~~," "Canadian Iranian Wakuppers Foundation," a political movement associated with defamation, harassment, and attacks on pro-democracy activists. Ahmadzadeh played a critical role in illegally obtaining and leaking confidential and legal documents belonging to the Plaintiff.
- **Sedigheh Minachi**, a resident of British Columbia, directly involved in the theft of the Plaintiff's personal and legal documents. Minachi conspired with others to alter the stolen documents, forge new documents, and fabricate a narrative, described hereafter as the "Fake Voting Story", all in a coordinated campaign against the Plaintiff. She was instrumental in planning and executing the conspiracy to discredit the Plaintiff and further harass him online and offline, particularly on the basis of the Fake Voting Story.
- **Azar Khorramshahi**, a resident of British Columbia and known supporter of Reza Pahlavi, participated in spreading defamatory content and coordinated efforts to harm the Plaintiff's reputation and safety through

online platforms, particularly on the basis of and through disseminating the Fake Voting Story.

- **Mehdi Hajati**, a former official of the Iranian regime who later became a supporter and close ally of **Reza Pahlavi**, played a key role in promoting the Fake Voting Story.
- **Avideh Motmaen-Far**, a resident of Oakville, Ontario, and a former nomination candidate for the **Conservative Party of Canada** from Oakville, ON. She is also an active member of the **Ontario Association of Osteopathic Manual Practitioners (OAO)**. Motmaen-Far participated in publishing defamatory content against the Plaintiff and contributed to the coordinated harassment and conspiracy alongside other defendants. She notably participated in stealing and illegally obtaining the Plaintiff's confidential and legal documents, which she directly obtained from Ahmadzadeh. She played a key role in fabricating and disseminating the Fake Voting Story.
- **Arezou Soltani**, is an individual residing in North Vancouver, British Columbia. At all material times, she was a director of the Canadian Iranian Wakuppers Foundation and a co-administrator of the "WakeUppers' WhatsApp Group," alongside the co-defendant, Mehdi Ahmadzadeh.
- **Canadian Iranian Wakuppers Foundation ("Wakuppers Foundation")**, is a society incorporated in British Columbia under incorporation number S0078381. At all material times, it operated and oversaw the Wakuppers WhatsApp Group through its directors, including the Defendant, Ahmadzadeh, and the Defendant, Soltani."
- **X Corp.**, the corporation behind **X** (formerly **Twitter**), actively enabled and facilitated the spread of defamatory and harassing content and allowed used its publishing platform ~~to be used~~ for the publication and dissemination of confidential documents and false information about the Plaintiff. X Corp. persistently failed to remove false and defamatory content, including the

Fake Voting Story, and has refused to stop the dissemination of the Plaintiff's stolen legal documents and forged documents falsely attributed to the Plaintiff.

- **John Doe #1 to John Doe #8** ~~John Doe #10~~ are placeholders for individuals who, while currently unidentified, are believed to have participated in the coordination, publication, or dissemination of defamatory statements and harassment campaigns targeting the Plaintiff, breached the Plaintiff's privacy, and were specifically instrumental in disseminating the Fake Voting Story.
3. In or about July 2023, the Defendant, **Mehdi Ahmadzadeh**, took several boxes of the Plaintiff's personal, legal, and confidential documents to his business address. Although **Ahmadzadeh** volunteered and agreed to store the documents on the Plaintiff's behalf, the Plaintiff did not authorize him to access or use these documents for any purpose beyond storage. **Ahmadzadeh**, however, wrongfully took possession of the documents to leak them to other defendants, including **Avideh Motmaen-Far**.
4. The Plaintiff is currently engaged in several legal actions in the Supreme Court of British Columbia:
- Action S-240157 ("Pahlavi Action#1") against defendants **Khorramshahi, Minachi, Reza Pahlavi, X Corp.**, and others, concerning defamatory statements and conspiracy directed at the Plaintiff.
  - Action S-240300 against **Avideh Motmaen-Far**, regarding defamation and harassment linked to the broader conspiracy.
  - Action S-242366 (the "Wakeuppers Action") against three defendants from Canadian Iranian Wakeuppers, including its de facto leader, **Arezou Soltani**, related to an organized conspiracy and defamation targeting the Plaintiff.

6(a). Early Conspiracy Discussion. In or about January 2024, members of the "Wakuppers WhatsApp Group," co-administered by the Defendants, Mehdi

Ahmadzadeh and Arezou Soltani, discussed and promoted actions anticipating the later theft, forgery, and dissemination of the Plaintiff's confidential documents. In those discussions, Ahmadzadeh stated that the Plaintiff's "next move would be to sue" him and threatened to use documents entrusted to him by the Plaintiff in July 2023 against him. Other participants cautioned Ahmadzadeh that such misuse could expose him to legal liability, to which Ahmadzadeh replied that he would "take that risk." The Defendant, Soltani, who was at all material times a director of the Wakuppers Foundation and administrator of the group, was present during and facilitated these discussions. Around the same time, Ahmadzadeh falsely claimed that the Plaintiff's lawsuit against Reza Pahlavi (Pahlavi Action #1) was orchestrated by the MEK, and another group member referred to the Plaintiff as a "fascist" for suing Pahlavi, with the encouragement or acquiescence of Ahmadzadeh and Soltani. In February 2024, Ahmadzadeh further instructed group members to mass-report the Plaintiff's X (formerly Twitter) account in order to cause its suspension.

5. On June 27, 2024, the Honourable Court granted the Plaintiff a **Service Order** in Pahlavi Action#1, permitting substituted service by advertisement on **X** (formerly **Twitter**) for certain defendants in Pahlavi Action#1 identified only by their social media handles.
6. The Plaintiff had scheduled a hearing for June 27, 2024, to obtain the Service Order in Pahlavi Action#1. On or about June 27, 2024, and likely while the Court was underway, **Mehdi Ahmadzadeh** leaked confidential documents, and legal documents including the Plaintiff's passport and birth certificate, all belonging to the Plaintiff, to **Avideh Motmaen-Far** and others. The leak occurred in an apparent retribution for the Service Order granted by the Court.
7. A day after the granting of the Service Order, the Defendants' harassment, defamation, and privacy breach campaign against the Plaintiff escalated significantly, with multiple defendants amplifying the spread of confidential records and false information, and, specifically, the Fake Voting Story.

8. **Sedigheh Minachi** played a pivotal role in organizing the dissemination of the stolen documents and planning the campaign against the Plaintiff. On June 28, 2024, at 9:31 AM, ahead of the first publication of the defamatory Fake Voting Story on **X** (formerly **Twitter**), **Minachi** posted a defamatory coded message in Persian on Telegram ("**Minachi's Coded Message**"). Minachi's Coded Message was made accessible to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and was viewed, read, and republished by others in British Columbia and elsewhere. The message stated:

"I heard that some apologist mercenaries and underground agents of the Regime abroad, including in Canada, participated in the elections of the Islamic genocidal regime by mail. Shame on all of them. [followed by a vomiting emoji and an angry face emoji]"

9. This message was intended as an announcement of the coordinated campaign against the Plaintiff in an apparent retribution for the **Service Order**. Following this coded message, several defamatory posts were published and/or promoted on **X** (formerly **Twitter**) by various individuals and defendants, including John Doe defendants and the defendants, **X Corp.**, **Azar Khorramshahi** and **Mehdi Hajati**.
10. Following the publication of **Minachi's Coded Message**, multiple defamatory posts appeared on **X** (formerly **Twitter**), including but not limited to false claims that the Plaintiff participated in supporting the Islamic regime abroad and false accusations of fabricated personal history and fraudulent actions.

**10 (a). Commencement of The Collaboration Between The Defendants.**

- **Background:** In or about **April 2024**, the **Defendant, Mehdi Ahmadzadeh**, published a post on **X (formerly Twitter)** that included harassing and defamatory statements against the Plaintiff, including a call for the Plaintiff to be murdered. This post was based on and expanded from an earlier publication by the Defendant, Arezou Soltani, on Instagram. Ahmadzadeh's posts used the same photograph and theme first published by Soltani, with

additional defamatory content. This post was promoted by the Defendant, Sedigheh Minachi and others, and has been addressed in Pahlavi Action #1.

- Subsequently, Ahmadzadeh published a variation of this post on X, in which he tagged other Defendants in this action to involve them in promoting it and directing their attention to responses and discussions surrounding it. Defendants Ahmadzadeh and Minachi engaged in a public exchange of comments to the latter post, signaling their mutual collaboration and seeking further engagement from other Defendants.

11. The actions of the Defendants in this action, including **Reza Pahlavi, Mehdi Ahmadzadeh, Sedigheh Minachi, Azar Khorramshahi, Avidah Motmaen-Far, Mehdi Hajati, Arezou Soltani, Wakuppers Foundation, X Corp., and John Doe defendants**, included and directly caused defamatory and hateful publications made by X Corp. and Reza Pahlavi's supporters. This also led to an extensive and egregious breach of the Plaintiff's privacy, which has continued on **X (formerly Twitter)** despite numerous requests that X Corp. cease these actions.
12. The defamatory publications and breaches of privacy, which escalated after June 27, 2024, were carried out in retaliation for the Court's **Service Order**.
13. The actions of the Defendants, including the **defamatory publications**, the **leaking of confidential documents**, and the **threats and harassment** directed at the Plaintiff, are not just isolated incidents but part of a **coordinated campaign** designed to silence and intimidate the Plaintiff because of his **political beliefs**. The Plaintiff is a **pro-democracy activist** who has long opposed the ~~Iranian~~ regime ruling Iran. The Defendants, through their actions, have targeted him specifically for his political stance, seeking to undermine his credibility and activism.
14. The Defendants' actions, including the defamatory campaign on **X (formerly Twitter)** and elsewhere, amount to **political violence**, as they are aimed at achieving **political objectives** by **intimidating** and **silencing** individuals who

oppose the Defendants' political views. The coordination and dissemination of **false information** about the Plaintiff are intended to harm his **reputation**, **cause emotional distress**, and **suppress his advocacy**, all of which are consistent with politically motivated violence.

14 (a). **Agreement to Engage in Unlawful Conduct.** Between April 25, 2024, January 11, 2024 and June 29, 2024, the Defendants, through various communications and coordinated actions, reached an agreement to:

- a. **Steal and unlawfully obtain the Plaintiff's legal and confidential documents**, including but not limited to personal identification records ("Theft and Conversion").
- b. **Distribute these documents among themselves** for the purpose of public dissemination and continued harassment ("Unlawful Disclosure").
- c. **Breach the Plaintiff's privacy** by unlawfully publishing and sharing confidential documents ("Invasion of Privacy").
- d. **Forge documents (the "Forged Form" and "Forged Ballot") falsely attributing statements or actions to the Plaintiff** with the intent to harm his reputation ("Forgery & Fraudulent Misrepresentation").
- e. **Publish and disseminate forged documents** as part of a coordinated effort to defame the Plaintiff and cause him reputational harm ("Publication of False Instrument").
- f. **Publish defamatory content against the Plaintiff, including the false and malicious claim that the Plaintiff participated in the presidential election of the Islamic Republic of Iran**, despite knowing that such allegations were entirely untrue and fabricated by the Defendants ("Defamation and False Light").

14 (b) In the course of reaching this agreement, in January and February 2024, members of the Wakuppers WhatsApp Group, including the Defendant, Mehdi

Ahmadzadeh, speculated about abusing confidential documents entrusted to him and acknowledged the risk of legal liability, with such discussions occurring under the administration of the proposed Defendant, Arezou Soltani, and within the structure of the Wakuppers Foundation.

15. The Defendants' alignment with individuals associated with the **Islamic Revolutionary Guard Corps (IRGC)**, a **terrorist entity** designated by **Canada** as of **June 19, 2024**, further underscores the **politically violent** nature of their actions. The **IRGC** is known for using **psychological and physical violence** to achieve political goals. The Defendants' targeting of the Plaintiff, who is vocal in his opposition to the Iranian regime, fits into this pattern of **politically motivated harassment**.
16. The coordinated nature of these actions, including the use of **threats** and **harassment** aimed at instilling fear in the Plaintiff and **other activists**, constitutes an attempt to suppress political dissent, which falls within the scope of **political violence**. The Plaintiff has received **death threats** and other forms of intimidation as a result of the Defendants' campaign, demonstrating that their actions go beyond defamation and "simple" privacy breach and are part of a broader effort to **silence pro-democracy voices**.

**Furtherance of Conspiracy to Commit Theft and Conversion.**

17. The Defendant, Reza Pahlavi, through agency, the Defendant, Canadian Iranian Wakuppers Foundation, through its directing minds Ahmadzadeh and Soltani, and the rest of the individual Defendants through their direct involvement, engaged in a conspiracy to commit theft and conversion as part of their coordinated efforts to harm the Plaintiff.
18. In furtherance of this conspiracy, Ahmadzadeh stole several documents belonging to the Plaintiff, including:
- a sealed never-opened confidential letter (the "**Sealed Confidential Letter**") that on or about April 26, 2020, the Math Department at Simon

Fraser University sent to the Plaintiff in a sealed envelope bearing the word “confidential” stamped on it (the “**Sealed Envelope**”);

- a re-sealed confidential letter from the **Immigration and Refugee Board of Canada**, dated October 11, 2022, (the “**IRB Letter**”), which the Plaintiff had opened upon receipt and re-sealed and archived after reading its content;
- a sealed letter-sized envelope where the Plaintiff had archived copies of his Iranian identification documents, including colour copies of his passport (“**Paper Copy of Passport**”) and colour copies of his birth certificate (“**Paper Copy of Birth Certificate**”), and his old immigration-related documents, including paper copies of documents that he had scanned and submitted for renewing his passport in the year 2013, on which documents he had handwritten his particulars in Persian (the “**2013 Passport Renewal Document**”).

#### **Furtherance of Conspiracy to Commit Unlawful Disclosure.**

19. The Defendant, Reza Pahlavi, through agency, the Defendant, Canadian Iranian Wakuppers Foundation, through its directing minds Ahmadzadeh and Soltani, and the rest of the individual Defendants through their direct involvement, engaged in a conspiracy to commit unlawful disclosure as part of their coordinated efforts to harm the Plaintiff.

20. In furtherance of this conspiracy, the co-conspirators distributed the following stolen documents by Ahmadzadeh among themselves:

- The Sealed Confidential Letter;
- The IRB Letter;
- Paper Copy of Passport;
- Paper Copy of Birth Certificate; and
- 2013 Passport Renewal Document.

21. Among these documents, the Sealed Confidential Letter and the IRB Letter were further abused by Motmaen-Far who introduce them falsely as her own documents in Action S-240300, where she has persistently refused to disclose the manner she obtained those stolen documents.

**Furtherance of Conspiracy to Commit Forgery and Fraudulent Misrepresentation**

22. The Defendant, Reza Pahlavi, through agency, the Defendant, Canadian Iranian Wakuppers Foundation, through its directing minds Ahmadzadeh and Soltani, and the rest of the individual Defendants through their direct involvement, engaged in a conspiracy to commit forgery and fraudulent Misrepresentation as part of their coordinated efforts to harm the Plaintiff.

23. The Defendant, X Corp., was directly involved in, and further facilitated this conspiracy to commit forgery and fraudulent misrepresentation.

24. In furtherance of this conspiracy, the co-conspirators collaborated, for the purpose of fraudulent misrepresentation, to:

- forge a Google form in the Persian Language;
- type the Plaintiff's name on that form;
- complete the form (the Forged Form) by typing a proposal that mail-in ballots provision be made available to the Iranian Canadian community for them to take part in the elections of the regime of the Islamic Republic;
- print the completed form;
- take a picture of the printed completed form (the "Forged Picture");
- have the Forged Picture extensively published on X (formerly Twitter) alongside the Fake Voting Story;
- Alter the 2013 Passport Renewal Document by cutting a portion ("Forged Ballot");
- falsely present the Forged Ballot as the Plaintiff's filled-out ballot for the Iranian election in the Pakistani Embassy in Washington DC;

- Have the Forged Ballot published and disseminated to falsely attribute electoral participation to the Plaintiff and reinforce the Fake Voting Story.

#### **Furtherance of Conspiracy to Commit Publication of False Instrument**

25. The Defendant, Reza Pahlavi, through agency, the Defendant, Canadian Iranian Wakuppers Foundation, through its directing minds Ahmadzadeh and Soltani, and the rest of the individual Defendants through their direct involvement, engaged in a conspiracy to commit publication of false instrument as part of their coordinated efforts to harm the Plaintiff.
26. The Defendant, X Corp., was directly involved in, and further facilitated this conspiracy to commit publication of false instrument.
27. In furtherance of this conspiracy, the co-conspirators have collaborated and globally published the Forged Picture on X (formerly Twitter) since June 28, 2024, falsely claiming it to be proof of the Plaintiff's participation in that election (the "Fake Voting Story").
28. In furtherance of this conspiracy, the co-conspirators also have collaborated and globally published the Forged Ballot, which falsely attributed electoral participation to the Plaintiff.
29. The individual Defendants and X Corp. knowingly presented these falsified and forged documents to mislead the public, defame the Plaintiff, and cause reputational harm.

#### **Furtherance of Conspiracy to Commit Defamation and False Light**

30. The Defendant, Reza Pahlavi, through agency, the Defendant, Canadian Iranian Wakuppers Foundation, through its directing minds Ahmadzadeh and Soltani, and the rest of the individual Defendants through their direct involvement, engaged in a conspiracy to commit Defamation and False Light as part of their coordinated efforts to harm the Plaintiff.

31. The Defendant, X Corp., was directly involved in, and further facilitated this conspiracy to commit defamation and false light.
32. In furtherance of this conspiracy, the co-conspirators have collaborated and globally published on X (formerly Twitter) the defamatory publications described below, since the publication of and in response to Minachi's Coded Message on June 28, 2024,

**Defamatory Publication 1 ("PUB#1"); Publishers: All of the Defendants**

33. On or about June 28, 2024, the Defendants published globally on X (formerly Twitter) the Forged Picture alongside a defamatory and harassing content and ensuing conversation in the Persian language with the following accurate and fair translation:

"This is [the plaintiff's name], the pimp.

Blood white-washer, dishonourable, and one of the perpetrators of the murder of Iranian youth.

#election\_circus "

"I spit on you [the plaintiff's name], the rapist"

34. Through PUB#1, the Defendants falsely and maliciously attributed the following false and defamatory stings to the Plaintiff:

- a) **Fake Voting Story** – The false and defamatory sting that the Plaintiff participated in the 2024 presidential election of the Islamic Republic of Iran, falsely implying his support for the regime.
- b) **Pimp Sting** – The false and defamatory sting that the Plaintiff is a **pimp**, falsely implying criminal and immoral conduct.
- c) **Blood White-Washer Sting** – The false and defamatory sting that the Plaintiff is a **collaborator in covering up crimes against Iranian youth**, falsely implying complicity in state-sponsored violence.
- d) **Dishonourable Sting** – The false and defamatory sting that the Plaintiff is **dishonourable**, falsely attacking his integrity and character.
- e) **Rapist Sting** – The false and defamatory sting that the Plaintiff is a **rapist**, falsely accusing him of a serious criminal offense.

- f) **Regime Collaboration Sting** – The false and defamatory sting that the Plaintiff is a collaborator with the Islamic Republic's electoral system, falsely suggesting he engaged in its political processes.
- g) **Mail-in Voting Advocacy Sting** – The false and defamatory sting that the Plaintiff advocated for mail-in voting in the Islamic Republic's election, falsely portraying him as someone who encouraged participation in the regime's political process.

35. **PUB#1** was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and was viewed, read, and republished by others in British Columbia and elsewhere.

**Defamatory Publication 2 ("PUB#2"); Publishers: All of the Defendants**

36. On or about June 28, 2024, the Defendants published globally on X (formerly Twitter) the Paper Copy of Passport (two copies, including a high resolution one); Paper Copy of Birth Certificate; and the Forged Ballot alongside a defamatory and harassing content in the Persian language with the following accurate and fair translation:

"See this much for now!

In your opinion, for what reason did [the plaintiff's name]

(#Crested Pigeon) has that he attended the Pakistani Embassy and 'the Interest Office of the Islamic Republic - Washington DC'???

p.s. 1: I refused to publish the full photo for a bunch of reasons.

p.s. 2: Well done to the patriotic people who sent these photos.

Higher quality:"

37. Through **PUB#2**, the Defendants falsely and maliciously attributed the following **false and defamatory stings** to the Plaintiff and engaged in the publication of false instrument:

- a) **Fake Voting Story** – The false and defamatory sting that the Plaintiff participated in the 2024 presidential election of the Islamic Republic of Iran, falsely implying his support for the regime.

- b) **Crested Pigeon Sting** – The false and defamatory sting that the Plaintiff is weak, compromised, or insignificant, falsely portraying him as an easy target or a traitor.
- c) **Espionage Sting** – The false and defamatory sting that the Plaintiff engaged in suspicious or covert activities involving foreign embassies, falsely implying espionage or illicit dealings.
- d) **Islamic Republic Collaboration Sting** – The false and defamatory sting that the Plaintiff has direct ties to the Islamic Republic's diplomatic or intelligence apparatus, falsely implying complicity with the regime.
- e) **Foreign Embassy Sting** – The false and defamatory sting that the Plaintiff has suspicious ties to the Pakistani Embassy and the Interest Office of the Islamic Republic in Washington, DC, falsely implying espionage or illicit dealings.
- f) **Publication of False Instrument** – The Defendants knowingly fabricated and disseminated the Forged Ballot, falsely attributing electoral participation to the Plaintiff and misleading the public with a falsified document.

38. **PUB#2** was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and was viewed, read, and republished by others in British Columbia and elsewhere.

### **Defamatory Publication 3 ("PUB#3"); Publishers: All of the Defendants**

39. On or about June 28, 2024, the Defendants published globally on X (formerly Twitter) the Forged Picture alongside a defamatory and harassing content in the Persian language with the following accurate and fair translation:

“There is not one person among Pahlavi's enemies who is not owned by the Regime :)

Look what I got :))

#Cult of the Craze

#shame\_on three corrupt Mullah Lefti MEK Member”

40. Through PUB#3, the Defendants falsely and maliciously attributed the following false and defamatory stings to the Plaintiff:

- a) **Fake Voting Story** – The false and defamatory sting that the Plaintiff participated in the 2024 presidential election of the Islamic Republic of Iran, falsely implying his support for the regime.
- b) **Regime Affiliation Sting** – The false and defamatory sting that the Plaintiff is "owned by the Regime", falsely implying that he is an agent, supporter, or operative of the Islamic Republic of Iran.
- c) **Cult Affiliation Sting** – The false and defamatory sting that the Plaintiff is part of a cult-like movement, falsely portraying him as someone belonging to a radical or fanatical group.
- d) **MEK Member Sting** – The false and defamatory sting that the Plaintiff is a member of the MEK, falsely implying an affiliation with a controversial organization for the purpose of discrediting him.
- e) **Corrupt Ideologue Sting** – The false and defamatory sting that the Plaintiff is one of the "three corrupt" individuals, falsely implying that he is ideologically compromised, untrustworthy, or engaging in misconduct.
- f) **Regime Collaboration Sting** – The false and defamatory sting that the Plaintiff is a collaborator with the Islamic Republic's electoral system, falsely suggesting he engaged in its political processes.
- g) **Mail-in Voting Advocacy Sting** – The false and defamatory sting that the Plaintiff advocated for mail-in voting in the Islamic Republic's election, falsely portraying him as someone who encouraged participation in the regime's political process.

41. **PUB#3** was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and was viewed, read, and republished by others in British Columbia and elsewhere.

**Defamatory Publication 4 ("PUB#4"); Publishers: All of the Defendants**

42. On or about June 28, 2024, the Defendants published globally on X (formerly Twitter) the Forged Ballot alongside a defamatory and harassing content in the Persian language with the following accurate and fair translation:

“Mr. [the plaintiff’s name], who had called us the IRGC and sued us, has voted.

Here it is another enemy of Pahlavi.”

43. Through PUB#4, the Defendants falsely and maliciously attributed the following false and defamatory stings to the Plaintiff and engaged in the publication of false instrument:

- a) **Fake Voting Story** – The false and defamatory sting that the Plaintiff participated in the 2024 presidential election of the Islamic Republic of Iran, falsely implying his support for the regime.
- b) **Regime Affiliation Sting** – The false and defamatory sting that the Plaintiff is a supporter or collaborator of the Islamic Republic, falsely implying that he engaged in the political process of the regime he opposes.
- c) **Hypocrisy Sting** – The false and defamatory sting that the Plaintiff secretly engaged in the very activities he publicly condemned, falsely portraying him as deceptive or lacking integrity.
- d) **Enemy of Pahlavi Sting** – The false and defamatory sting that the Plaintiff’s opposition to Reza Pahlavi is inherently discrediting, falsely implying that anyone who criticizes Pahlavi must be aligned with the regime ruling Iran.
- e) **Publication of False Instrument** – The false and defamatory sting that Defendants knowingly fabricated and disseminated the Forged Ballot, falsely attributing electoral participation to the Plaintiff and misleading the public with a falsified document.

44. PUB#4 was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and was viewed, read, and republished by others in British Columbia and elsewhere.

**Defamatory Publication 5 ("PUB#5"); Publishers: All of the Defendants**

45. On or about June 28, 2024, the Defendants published globally on X (formerly Twitter) the Forged Picture alongside a defamatory and harassing content and ensuing conversation in the Persian language with the following accurate and fair translation:

"There is not a single person who opposes Pahlavi and does not have a poopy butt. This is the sultan of suing anonymous users, [the Plaintiff's Name]"

"What is the story here?"

He e-mailed and requested a ballot box?"

"The Canadian government has not allowed the placement of ballot boxes He has written that "I don't have the conditions to leave Canada, give me the possibility to vote by mail" (probably because he can't leave Canada because despite his successive lawsuits against others for collecting damages, he didn't get anything, and he has to continue to live as a leech)."  
"We, the democracy seekers, must protest to the Canadian government [laughing face with hand over mouth emoji]."

46. Through PUB#5, the Defendants falsely and maliciously attributed the following false and defamatory stings to the Plaintiff:

- a) **Fake Voting Story** – The false and defamatory sting that the Plaintiff participated in the 2024 presidential election of the Islamic Republic of Iran, falsely implying his support for the regime.
- b) **Regime Affiliation Sting** – The false and defamatory sting that the Plaintiff requested a ballot box or sought to vote by mail in the Iranian election, falsely portraying him as an engaged participant in the regime's political process.

- c) **Financial Dependence Sting** – The false and defamatory sting that the Plaintiff is financially incapable and reliant on litigation for survival, falsely implying he is a leech or exploitative of others.
- d) **Poopy Butt Sting** – The false and defamatory sting that the Plaintiff, along with anyone opposing Reza Pahlavi, is shameful, disgraceful, or cowardly, falsely attacking his character and dignity.
- e) **Desperation Sting** – The false and defamatory sting that the Plaintiff is begging to vote by mail because he is unable to leave Canada, falsely implying he is trapped, powerless, or insignificant.
- f) **Regime Collaboration Sting** – The false and defamatory sting that the Plaintiff is a collaborator with the Islamic Republic's electoral system, falsely suggesting he engaged in its political processes.
- g) **Mail-in Voting Advocacy Sting** – The false and defamatory sting that the Plaintiff advocated for mail-in voting in the Islamic Republic's election, falsely portraying him as someone who encouraged participation in the regime's political process.

47. **PUB#5** was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and was viewed, read, and republished by others in British Columbia and elsewhere.

#### **Defamatory Publication 6 ("PUB#6"); Publishers: All of the Defendants**

48. On or about June 29, 2024, the Defendants published globally on X (formerly Twitter) the Forged Picture alongside a defamatory and harassing content and ensuing conversation in the Persian language with the following accurate and fair translation:

"It was this same miry [plaintiff's name] who six months ago sued His Majesty Reza Shah II and 11 anonymous Twitter accounts for the crime of threatening him with death (as if we are nothing to do but kill a cardboard-dweller and turn him from a homeless vagabond into a champion of the left), and was seeking to discover our true identity

This dirty person, knowing that I live in #Iran and finding and spreading my identity will cause me what trouble, sued me and sought the judge's order to oblige Twitter to reveal our identity to this mercenary of the Regime and sympathizer of the hated Mojahedeen [MEK].

Now, this same person, because #Canada did not allow the placement of the Islamic Republic's ballot boxes in its country, has written to the embassy [of the Regime] that 'I cannot leave Canada, how can I vote?'

And, the [Regime's] embassy has provided the possibility of postal voting for this sponger person.

It means that voting was so important to him that he corresponded with the embassy to provide him with the possibility of voting.

The most interesting thing is that this #fake doctor and hungry beggar, after years of living in Canada, still does not have the money for a two-day trip to #America or Europe to vote and return, so he asked the embassy to provide him with an easier way to vote.

I now understand why he sued a person on a daily basis!!!

It turned out that he was so penniless and empty-handed that like his owner, the Toilet Brush, he was looking for compensation, but unfortunately for him, instead of royal compensation, all he got was a special #middle finger for Khamenei supporters.

p.s.: Well, you, hungry beggar, could tell us that "I am penniless, I want money", and we would do something for you.

Why did you sue us with a lawsuit that has now turned into a fart and faded away? [tagging the plaintiff]"

49. **Masih Alinejad**—whom the Defendants refer to using a derogatory slur—is an Iranian American journalist and outspoken critic of the Islamic regime ruling Iran. She has been the target of multiple assassination and kidnapping plots orchestrated by the Regime, as per the FBI. On March 20, 2025, two men, **Rafat**

Amirov and Polad Omarov, were convicted by a federal jury in New York City, for their involvement in a murder-for-hire scheme aimed at assassinating Alinejad. During the trial, a public speech by Ali Khamenei was played in court, where he incited action by his supporters against Alinejad. The verdict involves hiring by the Islamic Revolutionary Guard Corps (IRGC), which is part of the regime ruling Iran and directly responds to its leader, Ali Khamenei.

50. Through PUB#6, the Defendants falsely and maliciously attributed the following false and defamatory stings to the Plaintiff:

- a) **Fake Voting Story** – The false and defamatory sting that the Plaintiff participated in the 2024 presidential election of the Islamic Republic of Iran, falsely implying his support for the regime.
- b) **Regime Affiliation Sting** – The false and defamatory sting that the Plaintiff corresponded with the Iranian embassy to request voting access, falsely implying his collaboration with the Islamic Republic.
- c) **MEK Member Sting** – The false and defamatory sting that the Plaintiff is a sympathizer of the MEK, falsely implying a controversial political association to discredit him.
- d) **Judicial Harassment Sting** – The false and defamatory sting that the Plaintiff frivolously sues people on a daily basis, falsely implying he misuses the legal system for personal gain.
- e) **Fake Doctor Sting** – The false and defamatory sting that the Plaintiff falsely claims academic credentials, implying that he fraudulently presents himself as a doctor.
- f) **Owned by Toilet Brush Sting** – The false and defamatory sting that the Plaintiff is owned and controlled by Masih Alinejad, whom the Defendants refer to using a misogynistic slur ("Toilet Brush"). This falsely implies that the Plaintiff is acting under Alinejad's influence or direction, discrediting both individuals in a defamatory and degrading manner.
- g) **Royal Compensation Sting** – The false and defamatory sting that the Plaintiff, like his "owner" (Toilet Brush), is seeking compensation, falsely

implying he is attempting to extract money through deception or manipulation.

- h) **Homeless Vagabond Sting** – The false and defamatory sting that the Plaintiff is homeless and lives in extreme poverty, falsely attacking his dignity and personal circumstances.
- i) **Sponger Sting** – The false and defamatory sting that the Plaintiff lives off others without contributing, falsely implying he is a parasite or societal burden.
- j) **Desperation Sting** – The false and defamatory sting that the Plaintiff was so desperate to vote that he begged the Iranian embassy, falsely portraying him as pathetic and powerless.
- k) **Hypocrisy Sting** – The false and defamatory sting that the Plaintiff secretly engaged in the very activities he publicly condemned, falsely portraying him as deceptive or lacking integrity.
- l) **Laughingstock Sting** – The false and defamatory sting that the Plaintiff's lawsuits are so ridiculous that they have "turned into a fart", falsely portraying him as an incompetent and unserious litigant.
- m) **Financial Dependence Sting** – The false and defamatory sting that the Plaintiff relies on lawsuits for survival, falsely portraying him as a financial opportunist or extortionist.
- n) **Owned by Toilet Brush Sting** – The false and defamatory sting that the Plaintiff is owned and controlled by Masih Alinejad, whom the Defendants refer to using a misogynistic slur ("Toilet Brush"). This falsely implies that the Plaintiff is acting under Alinejad's influence or direction, discrediting both individuals in a defamatory and degrading manner.
- o) **Royal Compensation Sting** – The false and defamatory sting that the Plaintiff, like his "owner" (Toilet Brush), is seeking compensation, falsely implying he is attempting to extract money through deception or manipulation.
- p) **Middle Finger for Khamenei Supporters Sting** – The false and defamatory sting that the Plaintiff is a supporter of the Iranian Supreme

Leader, falsely portraying him as loyal to the regime and deserving of public scorn.

- q) **Regime Collaboration Sting** – The false and defamatory sting that the Plaintiff is a collaborator with the Islamic Republic's electoral system, falsely suggesting he engaged in its political processes.
- r) **Mail-in Voting Advocacy Sting** – The false and defamatory sting that the Plaintiff advocated for mail-in voting in the Islamic Republic's election, falsely portraying him as someone who encouraged participation in the regime's political process.

51. **PUB#6** was made to all individuals with access to the Internet content, including viewers and readers in British Columbia and elsewhere, and was viewed, read, and republished by others in British Columbia and elsewhere.

## **Part 2: RELIEF SOUGHT**

### **1. Damages for:**

- a. Breach of privacy;
- b. Theft and illegal possession of the Plaintiff's personal and legal documents;
- c. Unlawful disclosure ~~disclosure~~ and dissemination of the Plaintiff's personal and legal documents. The Defendants publicly and privately circulated stolen legal and confidential materials, breaching the Plaintiff's privacy and security while intentionally subjecting him to harassment and reputational harm. ~~confidential documents and legal documents;~~
- d. Defamation and the spread of false information about the Plaintiff, including the "Fake Voting Story" and other falsehood;
- e. Emotional distress and harm resulting from the Defendants' conduct;
- f. Participation in a conspiracy to harm the Plaintiff— The Defendants engaged in a coordinated conspiracy to steal, fabricate, forge, and

disseminate documents and publish false and defamatory materials, including stolen documents and forged documents (the Forged Ballot, the Forged Picture), fabricated narratives (Fake Voting Story), and derogatory attacks intended to destroy the Plaintiff's reputation, security, and livelihood. ~~through a coordinated online harassment campaign by the named Defendants and John Doe defendants.~~

2. **Injunctive relief** requiring the Defendants and **John Doe defendants** to:

- a. Return all of the Plaintiff's documents that are in the Defendants' possession, custody, or control;
- b. Cease further dissemination of any personal, confidential, or forged documents relating to the Plaintiff, and permanent injunction restraining the defendant from publishing, causing the statement and publication of, or instructing the publication of, any slanderous or libellous statement concerning the plaintiff.

2 (a) Specifically, as against X, **Injunctive relief** requiring X Corp. to permanently remove from X (formerly Twitter) all publications and materials that:

- a. involve or depict forged or falsified documents (including but not limited to the "Forged Picture" and "Forged Ballot"),
- b. contain false and defamatory statements as outlined in this pleading (including the "Fake Voting Story" and the defamatory stings enumerated herein),
- c. constitute the unlawful dissemination of the Plaintiff's private or stolen legal documents;

and a permanent injunction prohibiting X Corp. from republishing or enabling the republication of any such content, or any similar materials that amount to forgery, defamation, breach of privacy, harassment, or political violence.

3. **An order for an accounting and disclosure** of all communications, documents, or information that the Defendants and **John Doe defendants** shared with third parties regarding the Plaintiff, including documents obtained illegally or altered.

4. **Punitive and aggravated damages**, given the malicious nature of the Defendants' actions.
5. **Costs** of this proceeding.
6. **Designation as a Terrorist Entity**: The Plaintiff seeks an order referring **Reza Pahlavi** and his supporters, including all of the individual Defendants, to the relevant authorities for an investigation into their actions, which include elements of **political violence in Canada** aimed at silencing the Plaintiff's pro-democracy activism. The Defendants' coordinated campaign, including the use of organized criminal activity including theft, forgery, criminal defamation and defamation, threats and harassment fits within the scope of **political violence**, as it seeks to achieve political objectives through criminal conduct and the intimidation and silencing of political opponents. Reza Pahlavi has admitted to both **past and ongoing connections** with the **Islamic Revolutionary Guard Corps (IRGC)**, which has been listed as a **terrorist entity** in Canada as of **June 19, 2024**, due to its involvement in terrorism and political violence. Reza Pahlavi's objectives and methods, as reflected in his coordinated campaign against the Plaintiff, also align with those of the "Islamic Republic of Iran"—a state officially designated as a foreign state supporter of terrorism in Canada—further reinforcing the need for investigation under Canada's anti-terrorism framework.

### **Part 3: LEGAL BASIS**

1. The Plaintiff relies on the following legal principles and statutory provisions:
  - a. **Breach of Privacy**: The Defendants' unauthorized possession, alteration, and disclosure of the Plaintiff's private, legal, and personal documents amount to a serious invasion of privacy.
  - b. **Theft and Conversion**: The Defendants' unlawful taking and retention of the Plaintiff's property constitute theft and conversion.

- c. **Defamation and Injurious Falsehood:** The Defendants' dissemination of false statements and the "Fake Voting Story" has harmed the Plaintiff's reputation and standing within the community.
- d. **Conspiracy:** The Defendants conspired with others, including **John Doe defendants**, to intentionally harm the Plaintiff through a coordinated and malicious campaign of defamation, harassment, and privacy breach.
- e. **Intentional Infliction of Emotional Distress:** The Defendants' conduct, including the leaking of private documents and involvement in an online harassment campaign, was intended to cause or was reckless in causing the Plaintiff emotional harm.
- f. **Forgery and Publication of False Instrument:** The Defendants created and disseminated forged documents, including the "Forged Ballot" and "Forged Form," which falsely attributed statements or conduct to the Plaintiff, causing reputational and emotional harm.
- g. **Aiding and Abetting Tortious Conduct:** Certain Defendants, including X Corp., facilitated and encouraged the wrongful acts of others by actively publishing and republishing content as alleged herein, refusing to remove known harmful content, and enabling the continued dissemination of defamatory, forged, and stolen materials.
- h. **Harassment, Threats, and Political Violence:** The Defendants' coordinated conduct—including threats, coordinated harassment, and publication of materials designed to incite hatred and fear—amounts to political violence and intimidation, aimed at silencing the Plaintiff's pro-democracy activism.
- i. ~~f.~~ **Joint and Several Liability:** The Plaintiff seeks the same relief from all Defendants, including **John Doe defendants**, based on their joint participation in the coordinated actions alleged. Under the principle of **joint and several liability**, each Defendant may be held responsible for the full

extent of the harm caused, regardless of their individual degree of involvement.

### 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: 02/Sep/2025  
28/Mar/2025  
16/Sep/2024  
[dd/mm/yyyy]

Masood Masjoody  
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 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 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:                       |