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FROM: TYLER M. DAHL FAXED BY: LINDSAY VICKERS

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Re:

SOLO v. FINLEY *et al*

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June 24, 2015

OUR FILE: 117336-001

YOUR FILE: 132048

Daniel J. Reid

3200-650 West Georgia Street
Vancouver, BC V6B 4P7

Dear Sir:

Re: Solo v. Finley et al

Please find attached the amended Statement of Claim, a copy of which has been sent to you by regular mail along with two Acknowledgements of Service, one for the original Statement of Claim, and one for the amended Statement of Claim.

Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

Cuelenaere, Kendall, Katzman & Watson

Per:


Tyler M. Dahl

Direct: 477-7260

Email: tdahl@cuelenaere.com

TMD/lv

Attachment

FORM 3-9
(Rule 3-9)

COURT FILE NUMBER QB No 500 of 2015
COURT OF QUEEN'S BENCH FOR SASKATCHEWAN
JUDICIAL CENTRE SASKATOON
PLAINTIFF ASHU SOLO
DEFENDANTS SANDRA FINLEY, LOOSE FOOT
COMPUTING LIMITED, and FISHNET
COMMUNICATIONS LLC.

Clerk's Stamp

AMENDED STATEMENT OF CLAIM

1. The Plaintiff, ASHU SOLO, is an individual who resides in the City of Saskatoon, in the Province of Saskatchewan.
2. The Defendant, SANDRA FINLEY (hereinafter "Finley"), is an individual who resides in the Town of Qualicum Beach, in the Province of British Columbia.
3. The Defendant, LOOSE FOOT COMPUTING LIMITED (hereinafter "Loose Foot"), is a body corporate duly registered to carry on business in the province of Saskatchewan, with a registered office located at 204, 3988 Albert St. in the City of Regina, Saskatchewan. At all material times prior to approximately December 31, 2014, Loose Foot was the internet service provider (hereinafter "ISP") that hosted Finley's blog, The Battles, at the following universal resource locator (hereinafter "URL"): <http://www.sandrafinley.ca> (hereinafter "Finley's Blog" or "Blog").
4. The Defendant, FISHNET COMMUNICATIONS LLC (Общество с ограниченной ответственностью «Фишнет Коммюникейшнз») (hereinafter "Fishnet"), is a body corporate duly registered with the Russian Federation Unified State Registry of Legal Entities, with a registered office located at office 210, 22 Karavayevskaya str., St. Petersburg 192177, Russia (Россия, 192177 Санкт-Петербург, ул. Караваяевская, 22, офис 210). At all material times following approximately December 31, 2014, Fishnet was the ISP that hosted Finley's blog.

5. In or about 2013 and 2014, Finley sent various emails to individuals defaming the Plaintiff. In or about 2013 or 2014, Finley published many articles on her Blog defaming the Plaintiff—these articles were made public on or about June 20, 2014. In particular, Finley identified the Plaintiff by name and falsely and maliciously stated or republished others stating, *inter alia*, implicitly or explicitly, the following:

a. the Plaintiff is a liar;

- i. “The more I look the more I think he [the Plaintiff] is trying to invent himself and with his computer knowledge, he is using the internet to build a fake profile.” (republished statement by an unknown individual).
- ii. “Here is one example of a lie, manufactured by Ashu to create an alibi.”
- iii. “Which leads to another lie (January 11th). This lie, that he [the Plaintiff] came to the Airport to give me a ‘demand letter.’”
- iv. “The lies, name-calling, taunting and threats by Ashu against me use the same language and tactics as he uses against others”.
- v. “He [Ashu Solo] manufactures lies faster than you can say ‘the big lie of Hitler.’”
- vi. “Any doubt I might have had that I and others are wrong that his [the Plaintiff’s] business, academic and conference claims are dubious went out the window when I directly experienced his lies (the approximately 100 emails)”.
- vii. “I am only one of the people against whom Ashu Solo has launched a torrent of false accusations, threats and so on.”
- viii. “There was never a need for me to respond to his [the Plaintiff’s] continuing lies, growing insults and threats; it’s the old adage, give them enough rope, they’ll hang themselves.”
- ix. “Imagine yourself as first a busy person, which the recipients of his [the Plaintiff’s] messages are, then trying to be respectful, which these people are, and then having your inbox filled with Ashu’s rants, falsifications, and threats.”
- x. “Note the ease with which Ashu creates illusions: constant repetition of the theme that I am harassing him, telling lies about him, etc. creates the impression that I have been actively engaged in doing those things.”

- xi. "He [the Plaintiff] concocted another lie -- he said he had come to the Airport to serve his 'demand letter' on me."
- xii. "So he's [the Plaintiff's] busy creating a defence, which suggests to me that it is correct: the conferences were bogus."
- xiii. "Ashu's main problem is that he lies so often—you're [Sandra Finley] so right about him ignoring the substantive part of his complaints." (republished statement by Jane Doe, "Tonia Zimmerman").
- xiv. "The other serious threat to him is that you [Jane Doe, "Tonia Zimmerman"] disclosed material he [the Plaintiff] authored, to me. I think it comes down to a situation where his lies can be exposed."
- xv. "(I want to be careful how I phase this) in my opinion, you are correct when you say his [the Plaintiff's] claims about himself may be largely concocted. I can tell you more of what I have heard (only being able to conclusively prove parts of it, at least until someone gets their hands on a police report or two) if you are interested. I am keenly interested in what you have uncovered." (republished statement by Jane Doe, "Tonia Zimmerman").
- xvi. "By January 11th Ashu knew that the complaint had been laid. He responded with a lie."
- xvii. "It's pretty obvious to me that once he [the Plaintiff] was advised about January 9th Complaint #2, he needed a lie about the Airport, to try and get off the hook."
- xviii. "(Still blows me away that he [the Plaintiff] can just make these utterly untrue statements; the guy is devoid of conscience.)" and
- xix. "Don't underestimate Ashu's ability to lie straight in people's face. He MAKES UP lies, easily and routinely."

b. the Plaintiff is unemployed;

- i. "TITLE: Unemployed activist, by self-description." and
- ii. "I think that Ashu is likely unemployed."

c. the Plaintiff fabricated his curriculum vitae and his current and previous employers/employment;

- i. "MAVERICK TECHNOLOGIES. The only references to "Maverick Technologies America Inc" able to find are posted by Ashu and/or Crocel News (with which Ashu is associated) and/or posted by WORLDCOMP (with which Ashu is associated). The only actual corporate website able to find in a search for "Maverick Technologies" is <http://www.mavtechglobal.com/>. "Search" the site: nothing comes up for Ashu Solo. Nor does it list the position of "principal" when describing its leadership team, nor does it boast an R&D team)."
- ii. "I'm wondering if he [the Plaintiff] has made up his Maverick Technologies America Inc. trying to make it look as if he is related to Maverick Technologies (without the America Inc on the end) and also Trailblazer Intelligence Systems Inc being sort of like the company of Trailblazer Systems Inc. There are not a lot of good hits for Solo Research Lab either. (INSERT: There is more information about Solo Research Labs at Ashu Solo, credentials.) It is almost like he has been creating his own internet presence to match his not so credible CV. It might even be worth checking his education credentials as it wouldn't be the first time that someone embellished on their degrees. I don't question that he is an intelligent person, but I am wary that perhaps he may be using that intelligence to manufacture a persona. I do think we have to be careful as we proceed."
(republished statement by an unknown individual).
- iii. "SWANSEA UNIVERSITY (re preceding: *He is the director of Solo Research Lab at Crocels, Swansea University . . .*) Three "Searches" - Solo Research Lab / Crocels / Ashu Solo on the Swansea University web site (<http://www.swansea.ac.uk/>); no Ashu Solo. There is a Solo Research Lab web page at <http://www.soloresearchlab.org/>, ; it is only a "watch this space" stub of a web page, posted by Ashu Solo."
- iv. "The more I look the more I think he [the Plaintiff] is trying to invent himself and with his computer knowledge, he is using the internet to build a fake profile. I'm wondering how far any reporters or City of Saskatoon lawyers dug into this."
(republished statement by Jane Doe, "Tonia Zimmerman").
- v. "Maverick Technologies -- and he uses their corporate email address -- does not show anything related to him. "I am not certain that Maverick Tech is a bona fide

company, at least insofar as Ashu Solo is a “principal” there. There is more information at *Ashu Solo, credentials.*”

vi. “Note – the idea of “avatars” was big not so long ago. From Hindu deity down to present day video games where you create an avator to represent you on screen. That could be what Ashu has created. I am reminded of the webpage for the Cdn Childhood Cancer Control and Surveillance programme. If you don’t have the background letter from them which explains that their funding was cut and they don’t have any money for research or for analysis of the data that had been collected, you would think that it’s a great thing. That’s a problem with the internet – - there is little way to judge the reality behind. It’s pretty easy, given the time and some expertise to create a whole range of documents. People are known to do that.”

vii. “...that his [the Plaintiff’s] *business, academic and conference claims* are dubious.” and
viii. “You [Jane Doe, “Tonia Zimmerman”] mention criminal history. I did not find convictions, but instead the appearance of bogus conference(s). And the appearance that at least some claims related to credentials are bogus.”

- d. the Plaintiff impersonated a public officer and/or fabricated a military service and rank;
- i. “... interview an active Col in the Cdn Army about the status of “officer trainee” or whatever fictional rank you’ve [the Plaintiff’s] been posting.” (republished statement by Jane Doe, “Tonia Zimmerman”).
 - ii. “The info I got about Solo’s criminal behaviour was also from John Gormley (of all the people! Certainly no friend to the Greens, but the enemy of my persecutor strangely becomes my friend!) When the threatening websites first went up, I told Mr. Gormley, who then messaged Solo, and said that if Solo continued to persecute his critics in the same way he persecuted me, he would have on air witnesses of an assault involving Solo at River Heights School—in which case, the official records may be sealed—and also military witnesses who could confirm that the “rank” Solo keeps touting doesn’t actually exist in the Canadian Military.” (republished statement by Jane Doe, “Tonia Zimmerman”).
 - iii. “Jan 1, 2014 at 6:42 AM I’m extremely angered that Finley smeared (includes “the truth” about his association with the military and his [the Plaintiff’s] version of the

Conferences he organized -- maybe getting nervous about the early-December email he received from John Gormley?))." and

- iv. "What [John] Gormley DEFINITELY did: he provided information to [Jane Doe, "Tonia"] Zimmerman so that she could defend herself against Ashu's attacks, should they resume after Gormley sent an email to Ashu, telling him that if he heard of another attack on Zimmerman, or on two other women, Gormley would have a member of the Military on his show who would testify that the military titles Ashu claims are fictional -- they don't exist."

e. the Plaintiff assaulted ~~the Defendant~~ Finley;

- i. "Ashu then began an assault by email on me because I forwarded the complaint."
- ii. "WHY would Ashu Solo go after me this way, eventually taking the taunts, lies and threats to the point of tracking me down at the Airport?"
- iii. "TITLE: ASHU SOLO IN ATTACK MODE. Remember: I am only one of the people against whom Ashu Solo has launched a torrent of false accusations, threats and so on."
- iv. "Ashu starts the attacks on me."
- v. "I have the ability to imagine what his [the Plaintiff's] attacks are like for other people; I can extrapolate from my experience with him."
- vi. "There was never a need for me to respond to his [the Plaintiff's] continuing lies, growing insults and threats; it's the old adage, give them enough rope, they'll hang themselves."
- vii. "Today Ashu sent the predictable email of threats to me." and
- viii. "The lies, name-calling, taunting and threats by Ashu against me use the same language and tactics as he uses against others."

f. the Plaintiff assaulted other individuals;

- i. "Ashu will destroy the Green Parties in Saskatoon with his attacks. He has to be removed from the group. It might be unpleasant to do so, but one person should not be allowed to exercise his destructive powers. He drives people out; the opposite is required -- -- without even mentioning his threats to personal safety of people in Saskatoon".

- ii. "Why am I bothering with Ashu Solo? I have the ability to imagine what his attacks are like for other people; I can extrapolate from my experience with him".
- iii. "But exactly the same tactics, and in many cases the same wording, are used by Ashu Solo in his assaults on other people. See, for example, John Gormley email exchange with Ashu Solo".
- iv. "Speaks to What I Want for the community: people should not have to live in fear of what Ashu Solo may, or may not, do to them."
- v. "TITLE: ASHU SOLO IN ATTACK MODE. Remember: I am only one of the people against whom Ashu Solo has launched a torrent of false accusations, threats and so on."
- vi. "...(including an assault you [the Plaintiff] committed)". (republished statement by Jane Doe, "Tonia Zimmerman").
- vii. "The person who supplied the info to T Zimmerman is well-known and an older member of the Saskatoon society, not out to get Ashu, but willing to help T Zimmerman find some way to relieve the fears for her personal safety."
- viii. "I hope to have the story from Elvin Lau (another person Ashu has attacked) to add to the blogged info, soon."
- ix. "I think it is a good idea to collate all the info about his methods of interrogation. I have a few friends he has written threatening e-mails to in the past." (republished statement by Jane Doe, "Tonia Zimmerman").
- x. "I have the ability to imagine what his [the Plaintiff's] attacks are like for other people; I can extrapolate from my experience with him."
- xi. "My interpretation of her [Jane Doe, "Tonia Zimmerman"] handling of the situation is that she is intimidated to the point of inaction because she is powerless in the face of the attacks -- afraid that if she takes more steps, Ashu will make it worse for her. (You would have to be savvy with internet technology, and have a whole lot of time to spare, to be able to launch a defence against the attacks.)"
- xii. "PS- You [Sandra Finley] mention that the woman who is being threatened [by the Plaintiff] is a dedicated Green, is she a federal Green Party member? GPS Member? Or both?" (republished statement by Victor Lau).
- xiii. "I have made no attempt to record his assaults on other people, with the exception of his final email exchange with John Gormley."

- xiv. "The info I got about Solo's criminal behaviour was also from John Gormley (of all the people! Certainly no friend to the Greens, but the enemy of my persecutor strangely becomes my friend!) When the threatening websites first went up, I told Mr. Gormley, who then messaged Solo, and said that if Solo continued to persecute his critics in the same way he persecuted me, he would have on air witnesses of an assault involving Solo at River Heights School—in which case, the official records may be sealed—and also military witnesses who could confirm that the "rank" Solo keeps touting doesn't actually exist in the Canadian Military." (republished statement by Jane Doe, "Tonia Zimmerman").
 - xv. "What [John] Gormley DEFINITELY did: he provided information to [Jane Doe, "Tonia"] Zimmerman so that she could defend herself against Ashu's attacks, should they resume after Gormley sent an email to Ashu, telling him that if he heard of another attack on Zimmerman, or on two other women, Gormley would have a member of the Military on his show who would testify that the military titles Ashu claims are fictional -- they don't exist."
 - xvi. "John [Gormley] also threatened exposure of an assault made by Ashu (I believe it happened when Ashu was much younger)." and
 - xvii. "He [the Plaintiff] is giving the Green Party a bad name, in addition to putting people in fear for their safety. If you live in Saskatoon, if you say anything that questions him, if he gets your phone number and your address, you will worry."
- g. the Plaintiff committed fraud (generally and in addition to the allegations of, *inter alia*, being a liar, fabricating his *curriculum vitae*, organizing fake conferences, and impersonating a public officer);
- i. "The more I look the more I think he [the Plaintiff] is trying to invent himself and with his computer knowledge, he is using the internet to build a fake profile." and
 - ii. "Ashu Solo is acting as though he is a legitimate representative of the Green Party, federally and provincially. The allegations against him are serious. The matter needs to be dealt with expeditiously."

- h. the Plaintiff has a criminal record and engages in criminal behavior (generally and in addition to the allegations of, *inter alia*, fraud, assault, and impersonating a public officer);
- i. “Given the levels of harassment, and especially since it has been in person in your case (only because Mr Solo doesn’t yet know where my apartment is) you’re well within your right to get some sort of restraining order, barring him from contacting you.”
 - ii. “[John] Gormley had suspected the attacks would start up again, and so gave me [Jane Doe, “Tonia Zimmerman”] his [the Plaintiff’s] last name (and loads of other information about his past, criminal history) as a failsafe: if the attacks started again, I could defend myself with this knowledge, as Ashu does not want it public.” (republished statement by Jane Doe, “Tonia Zimmerman”).
 - iii. “You [Jane Doe, “Tonia Zimmerman”] mention criminal history. I did not find convictions, but instead the appearance of bogus conference(s). And the appearance that at least some claims related to credentials are bogus.”
 - iv. “The info I got about Solo’s criminal behaviour was also from John Gormley (of all the people! Certainly no friend to the Greens, but the enemy of my persecutor strangely becomes my friend!) When the threatening websites first went up, I told Mr. Gormley, who then messaged Solo, and said that if Solo continued to persecute his critics in the same way he persecuted me, he would have on air witnesses of an assault involving Solo at River Heights School—in which case, the official records may be sealed—and also military witnesses who could confirm that the “rank” Solo keeps touting doesn’t actually exist in the Canadian Military.” (republished statement by Jane Doe, “Tonia Zimmerman”).
 - v. “I can’t remember if Gormley outright mentioned the illegal/immoral activity having to do with Hamid Atabnia, and the conferences, etc, but I’m sure that’s info Solo wouldn’t want being aired either.” (republished statement by Jane Doe, “Tonia Zimmerman”).
 - vi. “As for your [Sandra Finley’s] investigations into Mr. Solo, I’ve [Jane Doe, “Tonia Zimmerman”] done some of my own, and was further shocked and frightened by what I uncovered. You phrased it very well—what I learned (if true) really shook me, and made me all the more frightened of this man.” (republished statement by Jane Doe, “Tonia Zimmerman”).

- vii. "(I want to be careful how I phrase this) in my opinion, you are correct when you say his [the Plaintiff's] claims about himself may be largely concocted. I can tell you more of what I have heard (only being able to conclusively prove parts of it, at least until someone gets their hands on a police report or two) if you are interested. I am keenly interested in what you have uncovered." (republished statement by Jane Doe, "Tonia Zimmerman") and
 - viii. "If he [the Plaintiff] was innocent, he would have welcomed an arms' length investigation by the GPC regarding the Zimmerman complaint."
- i. the Plaintiff is a bully;
- i. "More seriously: she [Jane Doe, "Tonia Zimmerman"] submitted email exchanges. My quick interpretation is a case of cyber bullying to the point where the woman is fearful of what Ashu can do to her by what he is posting, including and up to material on a blog -- she says the material Ashu is posting about her is unfounded."
 - ii. "My interpretation of her [Jane Doe, "Tonia Zimmerman's"] handling of the situation is that she is intimidated to the point of inaction because she is powerless in the face of the attacks -- afraid that if she takes more steps, Ashu will make it worse for her. (You would have to be savvy with internet technology, and have a whole lot of time to spare, to be able to launch a defence against the attacks.)"
 - iii. "EVEN IN HIS BULLYING TACTICS, ASHU USES ILLUSION."
 - iv. "Ashu is not "litigious". What he does is called *bullying*."
 - v. "HOW WILL YOU BENEFIT FROM THIS STORY? You'll learn a bit about real, live cyber-bullying. You will also benefit if more people say, 'Hey, the world has changed. Together, we need to figure out how to deal with the Ashu Solo's of the world. (Cyber-bullying)'."
 - vi. "Thanks for your [Sandra Finley's] concern about me, but I learned the hard way that harassment through social media is not taken seriously by local police, so I'm really not worried about it. I went to the police with all of the harassment that Solo has thrown at me, and they said there's no way to prove it was really Ashu Solo

who said and did these things.” (republished statement by Jane Doe, “Tonia Zimmerman”).

- vii. “Maybe it would stop his [the Plaintiff’s] bullying of people because there are now consequences – - he will be exposed for what he is.”
- viii. “I am so sorry to hear about his [the Plaintiff’s] bullying you [Sandra Finley] at an airport. I am fortunate to say that I have yet to encounter Solo in real life—though I’m sure he has tried to track me down as well—thank God for unlisted phone numbers!—but I am glad others intervened, and that you held your ground. I do find it telling that so often the targets of his animus tend to be women. Not just women in general, but outspoken, politically active women. It makes me shudder a bit to think how dark that man’s life must be that this is what fills it.” (republished statement by Jane Doe, “Tonia Zimmerman”). and
- ix. “I was contacted by Saskatoon City Police in late winter 2014. I gave them the password to this on-line documentation regarding the cyber-bullying by Ashu.”

j. the Plaintiff is a misogynist;

- i. “I am so sorry to hear about his [the Plaintiff’s] bullying you [Sandra Finley] at an airport. I am fortunate to say that I have yet to encounter Solo in real life—though I’m sure he has tried to track me down as well—thank God for unlisted phone numbers!—but I am glad others intervened, and that you held your ground. I do find it telling that so often the targets of his animus tend to be women. Not just women in general, but outspoken, politically active women. It makes me shudder a bit to think how dark that man’s life must be that this is what fills it.” (republished statement by Jane Doe, “Tonia Zimmerman”).
- ii. “I felt like these messages were at least partially motivated by gender, as he [the Plaintiff] attacked my looks very centrally in all his messages. I would strongly suggest the Green Party re-think their affiliation with Mr. Solo, because he may have sent other messages to other people with whom he disagreed. I believe he is a liability to the party, and, on a personal level as a woman, a terrifying figure.” (republished statement by Jane Doe, “Tonia Zimmerman”).

- iii. “Even if you don’t care about a single women being taunted and tortured, please think of the negative PR this man [the Plaintiff] will generate for your party.” (republished statement by Jane Doe, “Tonia Zimmerman”). and
- iv. “You [the Plaintiff] may dream that you are not being given a fair chance, that the election is rigged, or whatever your grievance may be. You might want to be a victim, I have no idea. You may want to be a disruptive force in the organization, I have no idea. Who knows, maybe you hate women.”

~~k. the Plaintiff made sexual threats and/or sent sexual messages;~~

l. the Plaintiff organizes fake conferences;

- i. “that his [the Plaintiff’s] *business, academic and conference claims* are dubious.”
- ii. “So he’s [the Plaintiff’s] busy creating a defence, which suggests to me that it is correct: the conferences were bogus.”
- iii. “I have found WORLDCOMP denounced as bogus in the following pages, including frequent mention of Ashu Solo’s involvement: <https://sites.google.com/site/dumpconf/> (has extensive links to comments by numerous researchers) <http://worldcomp-fake-bogus.blogspot.ca/> <http://www.qualityofconferences.com/> I can’t verify the credentials of the people making the accusations, but the number of different sources and the number of references given, at least in the first of the three sites, means it’s a little hard to dismiss all that as the work of a single crank.” and
- iv. “You [Jane Doe, “Tonia Zimmerman”] mention criminal history. I did not find convictions, but instead the appearance of bogus conference(s). And the appearance that at least some claims related to credentials are bogus.”

m. the Plaintiff operates fake businesses (see also the above heading, “the Plaintiff fabricated his curriculum vitae and his current and previous employers/employment”);

- i. “Maverick Technologies – - and he [the Plaintiff] uses their corporate email address – - does not show anything related to him. I am not certain that Maverick

Tech is a bona fide company, at least insofar as Ashu Solo is a "principal" there. There is more information at [Ashu Solo, credentials.](#)"

- ii. "Same as Maverick Technologies. But Maverick Technologies -- and he [the Plaintiff] uses their corporate email address -- does not show anything related to him. See the info on his business associations. I am not certain that Maverick Tech is a bona fide company."
- iii. "From his [the Plaintiff's] C.V.: Principal/Interdisciplinary R&D Engineer and Mathematician at Maverick Technologies America Inc. Director/Interdisciplinary Researcher at Solo Research Lab, Maverick Technologies America Inc. I did a search on the company's website for Ashu+Solo. No Results" and
- iv. "It's pretty easy to put it all together, especially since his [the Plaintiff's] phony business uses the word 'Maverick'." (republished statement by Jane Doe, "Tonia Zimmerman").

n. the Plaintiff has mental health problems;

- i. "All of that should give most people cause to question the mental health of someone [the Plaintiff] who purports to be human rights activist." (republished statement by Vicki Streliaff).

o. the Plaintiff is a torturer and terrorist, or has tortured and terrorized; and

- i. "That was the most galling part--as though he [the Plaintiff] wasn't outright terrorizing my life, just to force my silence." (republished statement by Jane Doe, "Tonia Zimmerman"); and
- ii. "Even if you don't care about a single women being taunted and tortured, please think of the negative PR this man [the Plaintiff] will generate for your party." (republished statement by Jane Doe, "Tonia Zimmerman").

p. the Plaintiff is like the Mafia, the Nazis, dictators, tyrants and Hitler.; and

- i. "In today's world "the mafia" uses the threat of taking you to Court to silence you. Ashu creates the illusion that he has power – he can bring the force of the law against you."
- ii. "He [the Plaintiff] manufactures lies faster than you can say 'the big lie of Hitler."
- iii. "If we cannot stop this petty tyrant [the Plaintiff], it bodes poorly for stopping the larger tyrants in our society."
- iv. "I agree with you [Sandra Finley]—I think the end is coming for his [the Plaintiff's] affiliation with the Green Party, and with it, any hopes of "power" for this teapot dictator." (republished statement by Jane Doe, "Tonia Zimmerman"). And
- v. "First they came ...It seems to me that this is the same theme as "First they came ... " BUT! at the community level. Ashu Solo went after Tonia Zimmerman. . . others, me, and the list just kept growing. A society needs to STOP such behaviour, not just step aside if it's not YOURSELF that is affected. Eventually, the wholesomeness of the community is affected. People become pitted, one against the other. The community is headed in a direction opposite to what is desirable. (First they came is the famous statement and provocative poem attributed to pastor Martin Niemöller (1892–1984) about the cowardice of German intellectuals following the Nazis' rise to power. (more [http://en.wikipedia.org/wiki/First they came ...](http://en.wikipedia.org/wiki/First_they_came...))."

q. the Plaintiff lacks a conscience and/or lacks empathy.

- i. "Empathy? Does he never consider what he is doing to the families of other people?"
- ii. "(Still blows me away that he [the Plaintiff] can just make these utterly untrue statements; the guy is devoid of conscience.)" and
- iii. "He [the Plaintiff] can (will) turn things back on you, even if you don't give him ONE THING to work with. He will simply say that you said XYZ. He does not have a conscience."

6. In or about 2014, Finley published many hyperlinks on her Blog to articles on her Blog defaming the Plaintiff.

7. On or about December 18, 2013, the Plaintiff sent to Finley a demand that she cease defaming him. On or about December 28, 2013, the Plaintiff personally served Finley with a formal demand letter, demanding the same, at the Saskatoon International Airport. Throughout December 2013 to February 2014, the Plaintiff sent emails to Finley requesting that she cease defaming him. Further formal demands were sent on or about August 1, 2014, December 11, 2014, and February 13, 2015. To date, the offending material continues to be published.
8. On or about July 9, 2014, the Plaintiff sent Loose Foot a demand that it discontinue hosting the defamatory content on Finley's Blog. Throughout July 2014 to September 2014, the Plaintiff sent emails to Loose Foot requesting that it discontinue hosting the defamatory content. An additional demand was sent on or about December 11, 2014. Loose Foot did not discontinue hosting the defamatory content until approximately January 2, 2015.
9. On or about January 6, 2015, the Plaintiff sent Fishnet a demand that it discontinue hosting the defamatory content on Finley's Blog. A further demand was sent on or about January 23, 2015. To date, Fishnet continues to host the offending material.
10. The Plaintiff has suffered a loss of reputation by the false and malicious statements of Finley.
11. Further and in the alternative, the Plaintiff claims against Finley for violation of privacy, pursuant to section 2 of *The Privacy Act*. In particular, the Plaintiff claims that Finley has published the Plaintiff's private information, including but not limited to the following: the names and contact information of the Plaintiff's family; the contact information of the Plaintiff; and personal communications between the Plaintiff and various third parties. Without limiting the foregoing, the following are examples of the Plaintiff's privacy being violated by Finley (all of the following examples were published by Finley under password protection on her Blog in or about 2013 or 2014, and later made visible to the public on or about June 20, 2014):
 - a. Finley published approximately 135 electronic communications written by the Plaintiff to the Green Party of Canada and the Green Party of Saskatchewan. Many of those communications expressly or implicitly state that the Plaintiff intends for the communications to be kept private and/or confidential. Two of such communications

are as follows: From the Plaintiff to Larry Waldinger, Vicki Strelieff, Patricia Farnese, Kaitlyn Harvey, Mark Bigland-Pritchard, Daeran Gall, Marlene Wells, John Murney, and Victor Lau (April 4, 2014, at 7:38 PM); and From the Plaintiff to The Green Party of Canada and The Green Party of Saskatchewan (December 12, 2013, at 1:29 PM);

b. Finley published the following information regarding the Plaintiff's father: "[name removed] Ph.D. (U. of Warwick); D.Sc. (U. of Saskatchewan)(IEEE-Life Fellow; SPIE-Fellow; IFSA-Fellow) Professor (Emeritus) & Distinguished Research Chair Director... Home Address: [address removed]";

c. Finley published the following information regarding the Plaintiff's name: "Ashu Solo's two name changes (from Ashu Gupta)... September 19, 1971 Ashu Gupta born; December 20, 1999 Name changed to Ashu Maverick Gupta SOLO; January 24, 2001 Name changed to Ashu M. Gupta SOLO"; and

d. Finley published the following statements made by Jane Doe, "Tonia Zimmerman", acknowledging that the Plaintiff did not want his personal information published: "I am so sorry for all of this, Sandra... I got his name from John Gormley... if the attacks started again, I could defend myself with this knowledge, as Ashu does not want it public. I have not made his last name public, but instead implored Ashu's father to tell Ashu to leave me alone. I know this may seem over the line..."

12. Further and in the alternative, the Plaintiff claims against Finley for injurious falsehood. In particular, the Plaintiff claims as follows:

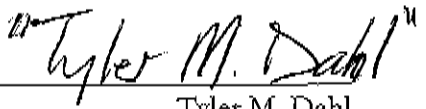
- a. Finley published false words, phrases and allegations of fact (as identified in paragraph 5), which were intended to injure and damage and which in fact injured and damaged, *inter alia*, the Plaintiff's business, goodwill and reputation;
- b. Finley made the above publications with malice and/or reckless disregard for the truth; and

- c. the Plaintiff has suffered, *inter alia*, a loss of employment opportunities, a loss of business, distress and medical damages, as a result of the above publications.
13. Further and in the alternative, the Plaintiff claims against Finley for intentional interference with economic relations, the particulars of which are outlined above.
14. Furthermore, Finley was actuated by malevolence toward the Plaintiff, her statements were knowingly false or knowingly likely to mislead the public, and she made the statements with the intention of harming the Plaintiff's reputation. The intentional wrongs of Finley as pleaded herein are shocking and egregious and warrant an award of punitive, aggravated, and/or exemplary damages.
15. The Plaintiff is seeking interest on all amounts owing pursuant to *The Prejudgment Interest Act*.
16. The Plaintiff claims against the Defendants, jointly and severally, the following relief:
 - a. Special damages in an amount to be proven at trial;
 - b. General damages in an amount to be determined by this Honourable Court;
 - c. Punitive, aggravated and/or exemplary damages in an amount to be determined by this Honourable Court;
 - d. Pre-judgment interest pursuant to *The Prejudgment Interest Act*;
 - e. Costs of and incidental to this action;
 - f. An interim, an interlocutory and a permanent injunction restraining the Defendants from defaming the Plaintiff, and restraining the Defendant from discussing the Plaintiff with anyone, or publishing or distributing any material relating to the Plaintiff;

- g. An interim, an interlocutory and a permanent injunction restraining the Defendants from publishing the Plaintiff's private information, pursuant to section 7(b) of *The Privacy Act*, and
- h. Such further and other relief as counsel may suggest, this case may allow, and/or this Honourable Court may deem just.

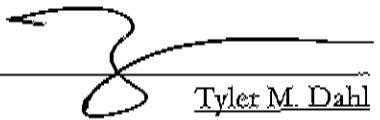
DATED at Saskatoon, Saskatchewan, this 17th day of April, 2015.

CUELENAERE KENDALL KATZMAN & WATSON

Per: 
 Tyler M. Dahl
 Solicitor for the Plaintiff,
ASHU SOLO

AMENDED at Saskatoon, Saskatchewan, this 24th day of June, 2015.

CUELENAERE KENDALL KATZMAN & WATSON

Per: 
Tyler M. Dahl
Solicitor for the Plaintiff,
ASHU SOLO

This *Amended Statement of Claim* was prepared and delivered by:

CUELENAERE, KENDALL, KATZMAN & WATSON
 Barristers and Solicitors, 500, 128 - 4th Avenue South
 Saskatoon, Saskatchewan, S7K 1M8

Lawyer in Charge of File: Tyler M. Dahl
Address for Service: Same as above
Telephone Number: (306) 653-5000

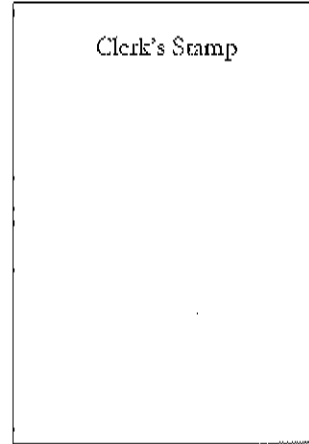
File Number: 117336-001/TMD

Court File No. **QB No. 500 of 2015**
Court of Queen's Bench for Saskatchewan

Judicial Centre **Saskatoon**

Plaintiff **Ashu Solo**

Defendants **Sandra Finley, Loose Foot
Computing Limited, and
Fishnet Communications
LLC.**



ACKNOWLEDGEMENT OF SERVICE

You are asked to fill out and sign this form without delay and return it by fax to **Tyler M. Dahl** at (306) 652-4171. If you do not return this signed and completed Acknowledgement of Service without delay, you may not receive notice of any further proceedings or any documents may be personally served on you and you will be required to pay the costs of service.

I acknowledge service on me of a copy of the following document:

Statement of Claim

(signature)

(date of service)

My name is: _____
(full legal name)

My address for service is *(address in Saskatchewan where Court documents may be mailed to or left for you)*:

My telephone number is: _____

My fax number is *(optional)*: _____

My e-mail address is *(optional)*: _____

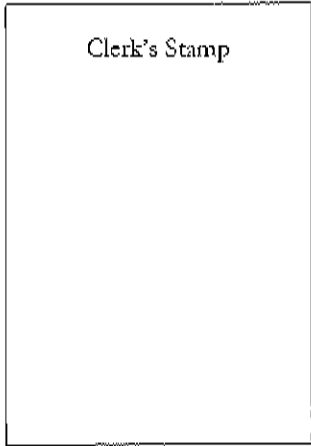
NOTICE

- (1) You must include an address in Saskatchewan where documents may be mailed to or left for you if you wish to receive notice of subsequent proceedings in this matter.
- (2) It is optional to include your fax number and e-mail address. If you include your fax number or e-mail address, documents may be served on you by fax or electronic transmission.
- (3) The address, fax number or e-mail address that you give on this form will be used to serve you with documents until you serve on the other parties and file with the court written notice of a new address for service.

CONTACT INFORMATION AND ADDRESS FOR SERVICE**If prepared by a lawyer for the party:**

Name of firm:	Cuelenaere, Kendall, Katzman & Watson
Name of lawyer in charge of file:	Tyler M. Dahl
Address of legal firms:	500-128 4 th Avenue South Saskatoon, SK S7K 1M8
Telephone number:	(306) 653-5000
Fax number (<i>if any</i>):	(306) 652-4171
E-mail address (<i>if any</i>):	tdahl@cuelenaere.com

Court File No. **QB No. 500 of 2015**
Court of Queen's Bench for Saskatchewan
 Judicial Centre **Saskatoon**
 Plaintiff **Ashu Solo**
 Defendants **Sandra Finley, Loose Foot
 Computing Limited, and
 Fishnet Communications
 LLC.**



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I acknowledge service on me of a copy of the following document:

Amended Statement of Claim

(signature)

(date of service)

My name is: _____
(full legal name)

My address for service is (*address in Saskatchewan where Court documents may be mailed to or left for you*):

My telephone number is: _____

My fax number is (*optional*): _____

My e-mail address is (*optional*): _____

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E-mail address (<i>if any</i>):	tdahl@cuelenaere.com