

SEP 18 2022

In the Supreme Court of British Columbia

Between



POSTMEDIA NETWORK INC. and KIM BOLAN

Plaintiff(s)

and

DENNIS WATSON and JOHN DOE

Defendant(s)

COUNTERCLAIM

Filed by: Dennis James Watson (the "defendant")

To: Postmedia Network Inc. and Kim Bolan

This action has been brought by the plaintiff(s) against the defendant(s) for the relief set out in the notice of civil claim filed in this action.

TAKE NOTICE that the defendant Dennis James Watson's claim against you for the relief set out in Part 2 below.

IF YOU INTEND TO RESPOND to the claim made against you in this counterclaim, or if you have a set-off or counterclaim that you wish to have taken into account at the trial, YOU MUST FILE a response to counterclaim in Form 4 in the above-named registry of this court within the time for response to counterclaim described below and SERVE a copy of the filed response to counterclaim on the address for service of the defendant(s) bringing this counterclaim.

YOU OR YOUR LAWYER may file the response to counterclaim.

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

Time for response to counterclaim

A response to counterclaim must be filed and served on the defendant(s) bringing this counterclaim,

- (a) if you were served with the counterclaim anywhere in Canada, within 21 days after that service,
- (b) if you were served with the counterclaim anywhere in the United States of America, within 35 days after that service,
- (c) if you were served with the counterclaim anywhere else, within 49 days after that service, or
- (d) if the time for response to counterclaim has been set by order of the court, within that time.

Claim of the Defendant Bringing the Counterclaim

Part 1: STATEMENT OF FACTS

1 August 31st 2022 I was served the Statement of Claim in this proceedings. September 1st I filed and served my response to that claim. I am now filing my counterclaim so it may be before the court when this matter is adjudicated.

2 I was completely blindsided by the application because there was no previous conversation about any of this despite the fact that my email address is posted on my website and blog for the world to see.

3 When I filed my response to this action, I had no idea how to contact the plaintiff's counsel. I couldn't find his email address on his firm's website. That's why I went to his office and asked for a business card so I could have his email address. It just dawned on me now to check the letterhead on the letter he sent with the Statement of Claim. Sure enough his email address is there. I'm older now and need glasses to see fine print. My point is, I had no previous email to reply to.

4 On September 1st 2022, counsel for the plaintiff responded to my request and sent me a copy of the two emails they claimed they sent me in August of last year to my old email address. I have absolutely no recollection of ever receiving those emails.

5 I vaguely remember a conversation about Kyle Gianis but I'm sure I would remember receiving correspondence from Kim Bolan's lawyer. That's kind of a big deal. I was shocked to read the second email they claim I received last year because it quoted a previous court case that I thought was sealed. I would have remembered getting that.

6 It turns out that just my case against [REDACTED] was sealed. [REDACTED] the original plaintiff in that action, intended to seal the other file but it appears that she

never did. My point is, I sincerely do not remember ever receiving either of those two emails the plaintiff claims they sent last summer to my previous email address.

7 My old email account was hacked and locked. I was eventually able to change the password and access that old account but I no longer use it. When I search the inbox for any email from [REDACTED] in that old account, they aren't there.

8 Normally, before someone sends you a Statement of Claim they send you a cease and desist letter demanding you cease and desist defaming their client. I have received no such request. In contrast, the letter the plaintiff sent with the Statement of Claim demands that I preserve the content of all the articles they have cited in their Statement of Claim. I have no idea what they are talking about.

9 In that letter dated August 30, 2022, they demand that I preserve the content of my blog with respect to the matter described in the Notice of Civil Claim. Normally if someone complains about a blog post they want you to take it down. I complied. If you refuse to take it down they ask the court to force you to take it down. I have no idea why they would want me to preserve the content of the articles they complained about. They complained about them so I deleted them. For some reason that doesn't appear to be good enough for them and I cannot understand why.

10 As I stated in my response to this claim, the plaintiff, Kim Bolan, posted a link on her blog to an article Keith Fraser wrote containing my home address in it. Matt Schrader, a Kelowna resident with a criminal record I had written quite extensively about, took a screenshot of my home address from her blog and posted it on his public Facebook with a link to Google maps describing exactly how to get there. The plaintiff knowingly and intentionally put my life and the life of my family at risk.

11 [REDACTED] who I presume to be this John Doe in the plaintiff's Statement of Claim, also took my home address from Kim Bolan's blog and posted it all over the internet along with vile defamation about my daughter and I. That matter was adjudicated. Yet I genuinely don't know who their John Doe really is.

12 Now, a third party known as [REDACTED] is still using my home address from Kim Bolan's blog to repost along with more defamation in [REDACTED] because he knows Google spiders those forums and people will see it when they Google my name. The damages caused by Kim Bolan's malicious act have not stopped.

13 The risk to my life is very real. It is not imaginary. The absurd claim the plaintiff made in their Statement of Claim that I put her life at risk by quoting an Irish saying is both ridiculous and defamatory. It is a bizarre fantasy that is clearly not reality based.

14 Putting those statements in a public court document allows her to defame me around the world. All she or one of her associates has to do is quote the false statement in the court document. As long as it's in a court document they can legally defame me on the Internet and throughout their vast audience.

15 Postmedia Network Inc is the largest media outlet in Western Canada. There are very few, if any, independent media outlets in Western Canada. I am just a blogger. I don't make any money from my blog. It costs me money to run. I am a volunteer who supports the Canadian Charter of Rights and the rule of law.

16 The US Constitution guarantees equal protection of the law. We don't have that in Canada. Here, a rich man and a poor man don't have equal protection of the law. Here, large corporations use expensive lawsuits to silence critics and stifle free speech. Yet Natural Justice declares that a rich man and a poor man should have equal protection of the law in Canada as well as in the US.

17 The Canadian Charter of Rights does guarantee free speech. I am legally permitted to disagree with Kim Bolan. I am legally permitted to express those opinions in Canada. I am also legally permitted to present a viewpoint that Postmedia Network Inc disagrees with. That is my right.

18 The Vancouver Sun and the Vancouver Province are now owned by Postmedia News herein referred to as Postmedia Network Inc along with the Surrey Now Leader. As a result, the Vancouver Sun's political promotion has significantly changed.

19 In Canada we used to think newspapers were objective and neutral. They're not. They all have a political affiliation they promote and suppress. The problem with media mergers is that when all the media outlets are owned by one entity, they become easier to control. Dissenting opinions no longer exist. That is why it is so imperative to protect free speech on the Internet.

20 Historically, the Vancouver Sun had a reputation for being slightly right wing, while the Vancouver Province had a reputation for being slightly left wing. When I say slightly I mean exactly that. That has all changed. Now the media bias has become extreme and obsessive. The term cancel culture has risen where independent voices are bullied and censored. All the newspapers have become clones of each other.

21 Wayne Moriarty used to be the Chief Editor for the Vancouver Province for over 13 years. When Postmedia bought the Vancouver Sun and the Vancouver Province, Wayne Moriarty was forced to step down and Harold Munro became the Chief Editor

for both Newspapers. Kim Bolan used to write for the Vancouver Sun while Keith Fraser used to write for the Vancouver Province.

22 Now both reporters write for either paper. Whatever they publish in one paper is also printed in the other. There is no longer any difference in the political affiliation of the Vancouver Sun and the Vancouver Province. They are exactly the same.

23 Surrey used to have two newspapers, the Surrey Leader and the Surrey Now. When Postmedia bought both newspapers, they got rid of the Surrey Leader and changed the name of the Surrey Now to the Surrey Now Leader. That means there are no independent voices in Surrey.

24 This process has repeated itself throughout Western Canada. Postmedia has bought up all the newspaper outlets merging some while eliminating others. As a result, they have gained complete control of the press.

25 The freedom of the press is protected by the US Constitution and the Canadian Charter of Rights. Protecting independent voices and the freedom of speech is essential in preserving a free society.

26 The preamble to the Canadian Bill of Rights states that "I am a Canadian, free to speak without fear, free to worship in my own way, free to stand for what I think right, free to oppose what I believe wrong, or free to choose those who shall govern my country. This heritage of freedom I pledge to uphold for myself and all mankind."

27 That is my pledge. I have the right to stand for what I think right, and I have the right to oppose what I believe wrong. This claim is trying to prevent that. I have the legal right to form, hold and express my opinion as does everyone else.

28 In the Canadian Parliament, whatever party has the most seats forms the government. Whatever party has the most seats after that form what is referred to as the Royal Opposition. The term Royal is used because dissenting voices are essential in a free society where everyone is held accountable, even the government.

29 If one party disagrees with another party's position, they express that and debate that. Disagreeing with someone's opinion is not considered defamation.

30 Doug McCallum is the mayor of Surrey. I live in Surrey. I supported his candidacy. The Vancouver Sun did not. The obsessive manner in which the Vancouver Sun misrepresented Doug McCallum's candidacy could quite feasibly be referred to as defamation. As a result, he no longer does interviews with the Vancouver Sun.

31 The freedom of the press in Surrey needs a royal opposition because right now there is none and this application is trying to keep it that way. My concerns with Kim Bolan's bias go far beyond Kim Bolan. Contrary to her belief, this is clearly not all about her. It's about free speech and the right to disagree.

32 For many years Harold Munro had a reputation for being a credible news source. When the Vancouver Sun was bought out by Potmedia, that all changed. In my opinion, the Vancouver Sun has become a cheap tabloid of political propaganda. Am I legally allowed to hold and express that opinion? I submit that I am.

33 On Jun 8, 2017 Kim Bolan published an article entitled *Surveillance video shows gunmen firing on Bacon's vehicle*. In that article she stated that Matt Schrader had set up his friends and associates Larry Amero and James Riach to be shot and killed by rivals. That bold face lie put Matt Schrader's life at risk. Kim Bolan did not care. She showed absolutely no regard for Matt Schrader's safety. That was unethical.

34 Just like when Kim Bolan posted my home address on her blog for all my enemies to see with absolutely no regard for my safety or for the safety of my children. That was unethical. Posting a court document is not unlawful but posting a court document without blocking out the home address is unethical.

35 I would never have done that to her or to any gang member. I would have given them the professional courtesy of blocking out their home address. Matt Schrader and I were enemies for years. Yet I would never put his life at risk like Kim Bolan did.

36 When I first started my blog, Kim Bolan once said to me "You take what the police say on one hand and what the Hells Angels say on the other hand. Somewhere in between, you find the truth." Kim Bolan no longer says that. Now she prints whatever the police ask her to. In exchange they give her access to the Bar Watch database.

37 In the 2017 article that put Matt Schrader's life at risk, she wrote what the police wanted her to write. The BC Gang Task Force, now known as the CFSEU, wanted Matt Schrader to become a police informant on his former associates after he had left the gang life and secured gainful employment. He refused so they got an unscrupulous witness with no credibility lie to the court about Matt Schrader. They thought that if they put his life at risk by spreading a lie, that would force him into witness protection and become an informant. That was unethical.

38 Kim Bolan was culpable in that crime by posting that lie in her article. Now quoting what was said in court is not unlawful. Yet she knew it was a lie so she simply said the witness told the court Matt Schrader set up his friends even though we knew he didn't.

39 Just because a witness tells the court something doesn't mean that it's true. It's up to the court to put those statements to the test of believability and discern the truth. That is the purpose of the court. Posting that lie was not unlawful but it was unethical.

40 Many years ago, I went through a difficult divorce. At that time my lawyer asked me what I will do when the other party starts to lie to the court. I was shocked and said oh they would never do that. My lawyer just looked at me like I was an idiot and shook his head. He knew something that I didn't. Witnesses lie to the court all the time. Back then I was somewhat naive and idealistic.

41 Year later I was speaking with another lawyer who was defending the judicial process and said just because witnesses lie to the court doesn't mean the court is corrupt. He expressed faith in the judicial process by saying that by cross examining witnesses in court, that is the best way to discover the truth. I agree. Although I recognize that witnesses who lie in court are often not properly cross examined.

42 That is why we need to put statements to the test of believability. Which brings us to paragraph 55(b) in the Plaintiff's Statement of Claim. That statement is a ridiculous lie. It completely fails the test of believability and goes way beyond defamation. It is straight up perjury. We need to visit that.

43 I often say Erin go bragh, Tiochfaidh ár lá. Especially on Saint Patrick's Day. I'm part Irish and spent two years in Ireland. Erin go bragh means Ireland forever while Tiochfaidh ár lá means our day will come. It has absolutely nothing to do with Kim Bolan. Tiochfaidh ár lá is a song like A Nation Once Again.

44 The plaintiff's claim that when I say Tiochfaidh ár lá it is a call for the UN to bring harm to Kim Bolan is absolutely ridiculous. I cannot comprehend how anyone can say that with a straight face. Telling the truth is not defamation but telling lies is. The Plaintiff's Statement of Claim is full of lies and therefore constitutes defamation.

45 I will now say a word about the size and scope of my shrinking audience. Kim Bolan brags about being a famous journalist for the Postmedia Empire. Although the Vancouver Sun in print is shrinking, Postmedia's Internet presence is huge. The Microsoft News Network links to Kim Bolan's articles which gives them massive traffic. As a result, the Postmedia Network has a vast audience.

46 In contrast, since I provide an alternative to the mainstream media's coverage of Covid and the New World Order, Google buries my blog. They intentionally suppress my search results and promote Ace Ventura who impersonates me because he endorses their biased mandate. When my blog first started over the Surrey Six

it was controversial and got a lot of traffic. When I was involved with a famous court case and my real name was posted on the front page of the local papers, traffic on my blog skyrocketed. However, over the years, traffic on my blog has greatly reduced.

47 Google used to spider my blog like other news outlets. As soon as I hit publish on a blog post it would automatically register with Google and come up in search results when people would Google the name of someone I wrote about. That doesn't happen any more. Now Google intentionally buries my search results so traffic on my blog has become insignificant. If you Google Gangsters out my blog still comes up but if you Google anyone I write about my posts' don't. For the most part they're buried now. I don't know how to use meta tags and I've never used them.

48 I will now say a word about my net worth. I remember sitting down with a financial advisor who asked me to list my assets and my debts so we could determine my net worth on paper. I laughed and said my net worth has nothing to do with what I own. My definition of worth and the world's definition is very different.

49 Nevertheless, for the records of the court I will confess that my net worth has now reached net zero. I don't own a home, I rent. I raised two children on my own as a single parent. I have helped support other children over the years but other than my own two children we have all gone our separate ways.

50 I ride a motorcycle that is over 10 years old full seasons to save gas. I bought an older jeep for my son but he is at university overseas. I do not make any money from my blog. It costs me money to run. I have a small advertising banner on the blog but since the traffic on my blog is so minuscule now, the money from that doesn't even pay for my Internet connection. The blog is free but hosting my web sites and domain names cost me money out of pocket to run.

51 This isn't a pity party. I'm stating the facts. I am at peace and accept responsibility for all my decisions in life. Confronting the agenda of the World Economic Forum and their New World Order is important to me because I am a free Canadian. I am free to stand for what I think right, free to oppose what I believe wrong. I support freedom and oppose slavery in any form. I was born a free man and God willing, I will die one.

52 For the past 15 years I have driven a forklift for Costco. For ten years before that I was a letter carrier with Canada Post and was originally a chef by trade which made it possible for me to travel around the world when I was young before I had children. I like my job and struggle like everyone else with the outrageous cost of housing in Metro Vancouver. I sometimes pick up overtime shifts just to make ends meet.

53 The world has changed. Investigative journalism no longer exists. There is no money in telling the truth any more. If you want to make money in journalism you have to sell your soul and promote the narrative. Then you need to bully and defame anyone who expresses an opinion contrary to that narrative.

54 If you are a Conservative, YouTube will automatically demonetize you and censor you. Then the fake fact checkers will harass you and defame you. When Candace Owens sued the fake fact checkers that were defaming her, she discovered that they were funded by the Communist Party of China. The fake fact checkers that report on the adverse reactions to RNA vaccines are funded by the pharmaceutical companies that profit from them. That is a conflict of interest.

55 James Topp is a former Canadian soldier who marched from Vancouver to Ottawa to protest lock downs and vaccine mandates. The Vancouver Sun and the mainstream media refused to cover it. Now he is continuing his march across Eastern Canada to maintain his protest. Recently he set up a GiveSendGo account to sue the mainstream media for defaming him. This is what happens when you merge all the media outlets into one. Independent voices are defamed and silenced.

56 The court is legally required to uphold the law. The Charter of Rights is the law the Supreme Court is mandated to uphold. Outside of the court, out in the real world, free speech is under fire. If the court does not protect the Charter of Rights in this crucial hour, no one else will and our free society will collapse.

57 Alex Jones recently lost a defamation case and was required to pay a huge settlement. He has a much bigger audience than I do and a lot more assets. He said that the Sandy Hook shooting never happened. I have no idea why he said that. It's like 9/11. We can debate whether or not it was an inside job but we all saw it happen.

58 If this court was to award the plaintiff costs and damages that would break me. I would be unable to pay it and it would send me directly to jail. I am here unrepresented to defend myself against false allegations. The Bible says a poor man is better than a liar. I may be a poor man but I am not a liar. Kim Bolan is. History has recorded that.

59 If the court awarded the defendant costs and damages, that would not phase the plaintiffs in the slightest. That means they have no incentive not to make false allegations in court. Clearly we don't have the same level of risk sitting on the table. My daughter [REDACTED] deserves a settlement for the pain and suffering Kim Bolan caused her. Matt Schrader deserves a settlement for the pain and suffering Kim Bolan caused him. If natural justice actually does exist in this world, then so mote it be.

60 I am hopeful that this court will uphold justice. I am hopeful that this court will put the plaintiff's false allegations to the test of believability and see through their lies to discern the truth. I am hopeful that the scales of justice will learn in my favor. Nevertheless, this is literally the hill that I will die on. My God given right to free speech. So in the words of Thomas Paine, "Give me liberty or give me death."

Part 2: RELIEF SOUGHT

1 Costs and damages including lost wages for court appearances.

Part 3: LEGAL BASIS

1 The Canadian Charter of Rights and the US Constitution because the servers for my blog and website are both located in the United States.

2 Although I am a Canadian living in Canada, the servers for my website and blog are not. The reason my trial against Telus' censorship on Youtube was in San Francisco is because YouTube's servers are in the United States.

3 I submit that the legal standard for defamation in this case is based on American law where the First Amendment requires the plaintiff to establish actual malice.

4 People have a legal right to express their opinion. Telling the truth is not defamation.

Address for service of defendant bringing this counterclaim [REDACTED]

E-mail address for service (preferred): dennis_watson100@protonmail.com

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

Date: 12 September 2022



Signature of the filing party

Dennis Watson

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.