



No. ^S226775
Vancouver Registry

In the Supreme Court of British Columbia

Between

POSTMEDIA NETWORK INC. and KIM BOLAN

Plaintiff(s)

and

DENNIS WATSON and JOHN DOE

Defendant(s)

RESPONSE TO CIVIL CLAIM

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

Part 1: RESPONSE TO NOTICE OF CIVIL CLAIM FACTS

Division 1 – Defendant's Response to Facts

1. The facts in paragraph 5 of Part 1 of the notice of civil claim has nothing to do with me. I run my blog and website by myself. I have no idea who this John Doe is that they refer to. It sounds like a blogger that goes by the name [REDACTED] who I have had numerous legal actions with. He has been a thorn in my side for many years. I have nothing to do with him.

2. The facts alleged in paragraph 4 need to be clarified. I run Gangstersout.com and the Gangsters out Blog at gangstersout.blogspot.com. I have run the blog since May 2009 and the website for slightly longer than that. After a legal complaint with [REDACTED] who was impersonating my blog I copyrighted the name. He then changed his to [REDACTED] which is still confusing for readers. He also runs another blog called [REDACTED] which I object to. He uses my name so it comes up on a Google search.

3. The facts alleged in paragraph 1,2 and 3 need to be clarified. Kim Bolan works for Postmedia News, the largest media outlet in Canada. She is using the law firm from that Corporate merger to silence me. I am a nonprofit volunteer who supports free speech and the Canadian Charter of Rights. Postmedia News is using their wealth to silence any and all independent news outlets. That is what they do through mergers and hostile takeovers.

4. The facts alleged in paragraph 6 - 48 need to be clarified. They have now expressed concern about thirteen articles I have written since my blog began in May of 2009. This is the first notice that I have received that they had any concerns whatsoever with what I wrote. Paragraph 56 states that on August 4 and 5, 2021 they expressed concerns to me about the content of the 13 articles. That is not true. They did not. This is the first I'm hearing about it.

5. I've been blogging for a long time now. Normally if someone has any concerns they contact you about them. If you don't correct it, they get a lawyer to contact you. If you still don't correct it, they serve you a Statement of Claim. Kim Bolan and Postmedia News have skipped all those steps and went straight to the Statement of Claim.

6. Paragraph 57 states that on August 12 and 30, 2021 the Plaintiff contacted my server and expressed a concern about the 13 articles. I have no knowledge of that. Neither of my servers mentioned that to me and the server for my blog always does when a legal complaint is made. The blog I have has a button where you can share posts on social media. I did not make the template for the blog. I have never encouraged anyone to share defamation or anything that is not true.

7. Paragraph 54 refers to a vile telephone message left on Kim Bolan's answering machine. That was not me. I have no idea who that was. This is the first I've heard about it. It sounds like [REDACTED] because that is the way he speaks to people but I don't know. It is false and offensive to imply that I had anything to do with that.

8. Paragraph 55 (b) is a bold faced lie. I have said *Tiocfaidh ár lá* on many occasions. I lived in Ireland for two years. It's a common saying there. It is Irish and it does mean "Our Day will Come" in English. It is a common saying the Irish use when faced with any injustice meaning that one day justice will be attained. If not in this life, at the judgment bar of God. It is in absolutely no way encouraging the UN Gang to take revenge on Kim Bolan.

9. That is a ridiculous lie with malicious intent. The Plaintiff wants to put that false statement in a court document so some other fake news outlet can report it. If someone was going to hire a hitman, they wouldn't broadcast it publicly first. They would do it privately in secret. I have never advocated violence even against the most vile gang members.

10. When I posted about David Giles before and during his cocaine conviction, I made it clear that I didn't want anyone including the UN Gang to shoot him. I always appeal to the law. I have never advocated violence and I would never post his or any other gang member's home address to bring harm to them. Yet, that is exactly what Kim Bolan did to me.

11. Kim Bolan posted a link on her blog to Keith Fraser's article with my home address in it. [REDACTED] a Kelowna resident with a criminal record I have written about, posted a screenshot of my home address he found on her blog and posted it on his public Facebook account along with a Google maps link on how to get there. She put my life at risk.

12. My son was too scared to come home for Christmas from UBC and my daughter who was living in the home was terrified. She set up booby traps like in the movie Home Alone in case someone broke into the home to kill us. She was terrified. The mental anguish Kim Bolan caused my family is genuine and the risk was real. That will be in my counterclaim.

13. With regards to the 13 articles they have expressed a concern about, I submit that:

(a) Article 1) Kyle Gianis set up by Kim Bolan and the CFSEU - deleted.
<https://gangstersout.blogspot.com/2021/08/kyle-gianis-set-up-by-kim-bolan-and.html>

(b) Article 2) Video footage of the Kelowna shooting - deleted.
<https://gangstersout.blogspot.com/2021/08/video-footage-of-kelowna-shooting.html>

(c) Article 3) Kyle Gianis dead: Take a bow Kim Bolan and CFSEU - deleted.
<https://gangstersout.blogspot.com/2021/08/kyle-gianis-found-dead-take-bow-kim.html>

(d) Article 4) CFSEU make fake Kelowna drug bust - deleted.
<https://gangstersout.blogspot.com/2021/08/cfseu-make-fake-kelowna-drug-bust.html>

(e) Article 5) Inside the battle by drug gangs for control of the DTES - deleted.
<https://gangstersout.blogspot.com/2021/08/inside-battle-by-drug-gangs-for-control.html>

(f) Article 6) Kim Bolan is a lying POS - deleted.
<https://gangstersout.blogspot.com/2021/08/kim-bolan-is-lying-pos.html>

(g) Article 7) Fatal Surrey Shooting Missrepresented - deleted.
<https://gangstersout.blogspot.com/2022/02/surrey-shooting.html>

(h) Article 8) SKS Monte Carlo synthetic stock
Any reference to Kim Bolan removed.

(i) Article 9) Dr Spin's take on the Jamie Bacon recording - deleted.
<https://gangstersout.blogspot.com/2022/04/dr-spins-take-on-jamie-bacon-recording.html>

(j) Article 10) Hells Angel shot in Vancouver - deleted.
<https://gangstersout.blogspot.com/2022/07/hells-angel-shot-in-vancouver.html>

(k) Article 11) Rabih (Robby) Alkhalil escapes pretrial
Any references to Kim Bolan removed.

(l) Article 12) Fatal shooting in Whistler - Update
Any references to Kim Bolan removed.

(m) Article 13) An escalation in violence - deleted.
<https://gangstersout.blogspot.com/2022/08/an-escalation-in-violence.html>

14. D. THE CLAIM AGAINST JOHN DOE. Paragraphs 62 and 63 don't apply to me. I have absolutely nothing to do with [REDACTED] if that is in fact him they are referring to.

15. E. THE COPYRIGHT CLAIM. Paragraphs 64 to 68 mentions a specific picture the Vancouver Sun posted which I altered and put on my blog. This is the first time they have expressed a concern to me about using that photo and I have immediately removed it.

16. I will point out that Kim Bolan and the Vancouver Sun used a picture of David Giles from my blog on many occasions and I did not complain. Not only did I consider that fair use, it was also in the public's best interest.

17. Neil Hall, Kim Bolan's associate from the Vancouver Sun, posted an animated picture I made of Peter Leask in his book Hell to Pay. He used that picture without asking me and I did not complain because I considered it fair use.

18. Pictures are posted and altered on social media and all over the Internet. It is often difficult to determine where the original came from. With regards to the picture listed in their Statement of Claim:

(a) Paragraph 69 (a) Targeted Shooting in South Vancouver - picture removed:
<https://gangstersout.blogspot.com/2018/12/targeted-shooting-in-south-vancouver.html>

(b) Paragraph 69 (b) Rabi (Robby) Alkhalil's trial is under way - picture removed.
<https://gangstersout.blogspot.com/2020/02/rabi-robby-alkhalils-trial-is-under-way.html>

(c) Paragraph 69 (c) VPD is looking for Damion Ryan - picture removed.
<https://gangstersout.blogspot.com/2021/07/vpd-is-looking-for-damion-ryan.html>

(d) Paragraph 69 (d) Inside the battle by drug gangs for control of the DTES - post deleted.
<https://gangstersout.blogspot.com/2021/08/inside-battle-by-drug-gangs-for-control.html>

(e) Paragraph 69 (e) Fatal shooting in Langley on the 1st anniversary of Mo - picture replaced.
<https://gangstersout.blogspot.com/2022/01/fatal-shooting-in-langley.html>

(f) Paragraph 69 (f) Damion Ryan busted? - picture removed.
<https://gangstersout.blogspot.com/2022/02/damion-ryan-busted.html>

Division 2 – Defendant's Version of Facts

19. My email address for service is dennis_watson100@protonmail.com It is posted on my blog. There is no reason the Plaintiff could not have mentioned any of these concerns to me before filing a Statement of Claim. Nonewhatsoever.

20. Counsel for the Plaintiff, Scott Dawson, is with the law firm Farris LLP. They have a website and he is listed on that website but there is no email contact provided. When I sent his office an email asking for clarification on what previous correspondence the Plaintiff was referring to in paragraph 56 of the Statement of Claim I received an automated reply stating "please contact the buyer or seller's lawyer or legal assistant directly." How may I do that?

Division 3 – Additional Facts

21. I would like to negotiate this matter before it's in Chambers but the Plaintiff is refusing to do so. I can't afford time off work to go to court. I'm a volunteer. My son is still in University overseas and my daughter still needs financial assistance. My legal counsel is very expensive. I can't afford to have him appear on my behalf. There is no reason this matter should have gone this far. All their concerns are now resolved so there is nothing left to litigate.

22. Except my counterclaim from when the plaintiff posted my home address on her blog and gang members took screenshots of it and posted it on social media. That counterclaim is of course still unresolved. Yet everything mentioned in their Statement of Claim has been resolved.

23. Please do not post my home address on the Internet like the Plaintiff did before.

Part 2: RESPONSE TO RELIEF SOUGHT

1. The defendant opposes the granting of any and all of the relief sought in the NOTICE OF CIVIL CLAIM including paragraphs 73, 74 and 75 of Part 2 of the notice of civil claim. Paragraph 74 (a) asked for an accounting of all profits made from my blog. There is none. I am a volunteer. I make no money from my blog whatsoever. I have a tiny advertising banner that doesn't even pay for my Internet connection nor does it pay for my website servers and domain names. I make no money from my blog. It costs me money to run it.

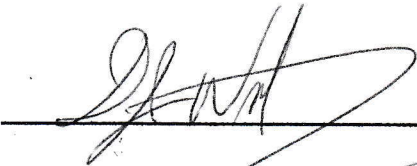
Part 3: LEGAL BASIS

1. The Plaintiff is under legal obligation to notify the defendant of any potential concerns before they file a Statement of Claim. The Plaintiff has failed to do that. As soon as they expressed a concern, I took the material they were concerned about down.
2. Copyright Claims fall under Fair Use. I altered the photo. As soon as they expressed a concern about me using it, I took it down. Despite the fact that they have used pictures of mine without permission.
3. I am solely responsible for my blog and am not legally liable for anything a third party says or does. Especially someone who has been so antagonistic against me for years.

Defendant's address for service [REDACTED]

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

Date: September 2nd 2022



Signature of Dennis Watson, defendant