

Court File No.: CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

B E T W E E N:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP and MOEZ KASSAM**

Plaintiffs

-and-

**JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR,
JACOB DOXTATOR, AND JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN
DOE 4 AND OTHER PERSONS UNKNOWN**

Defendants

A N D B E T W E E N:

ROBERT LEE DOXTATOR

Plaintiff by Counterclaim

-and-

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP, MOEZ KASSAM AND ALLEN SPEKTOR**

Defendants to the Counterclaim

MOTION RECORD (VOLUME 1 OF 3)
(Motion to Compel Answers to Undertakings and Refusals)

Date: November 30th, 2023
Returnable: May 7th, 2024

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TAB 1

Court File No.: CV-20-00653410-00CL

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B E T W E E N:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP and MOEZ KASSAM**

Plaintiffs

-and-

**JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR,
JACOB DOXTATOR, AND JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN
DOE 4 AND OTHER PERSONS UNKNOWN**

Defendants

A N D B E T W E E N:

ROBERT LEE DOXTATOR

Plaintiff by Counterclaim

-and-

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP, MOEZ KASSAM AND ALLEN SPEKTOR**

Defendants to the Counterclaim

NOTICE OF MOTION
(Motion to Compel Answers to Undertakings and Refusals)

THE DEFENDANTS James Stafford and Jacob Doxtator will make a motion to the Court, on a date and time to be fixed by the Registrar at the courthouse at 330 University Avenue, Toronto, Ontario, M5G 1R7.

PROPOSED METHOD OF HEARING: The motion is to be heard by videoconference.

THE MOTION IS FOR:

1. An order compelling the plaintiffs, Anson Advisors Inc., Anson Funds Management LP, Anson Investments Master Fund LP, and Moez Kassam, to answer the outstanding questions posed at the discovery of Moez Kassam, which questions are enclosed as Schedule A, together with all proper questions arising therefrom;
2. An order requiring the plaintiff Moez Kassam to re-attend for examination on questions arising from the plaintiffs' answers to undertakings, under advisements, and refusals and from the plaintiffs' answers to outstanding questions they are compelled to answer, at his own expense;
3. Costs of this motion; and
4. Such further and other relief as counsel may advise and this Honourable Court will permit.

THE GROUNDS FOR THE MOTION ARE:

1. This is a \$111-million lawsuit in which the plaintiffs allege, *inter alia*, that certain named and unnamed individuals conspired to defame them and harm their personal and business reputations through a series of anonymous and pseudonymous online posts;
2. These anonymous and pseudonymous online posts, as set out in the plaintiffs' claim (together the "Impugned Statements") are:
 - a. Tweets on the @BettingBruiser and @JohnMur67039143 Twitter accounts posted between August 25, 2019 and October 31, 2020;
 - b. Posts made on Stockhouse.com by the accounts "ToffRaffles", "JusinTime", "evtrader", "Bundyj", and "stocknsyrup" between July 23, 2020 and March 10, 2021; and
 - c. Two reports originally published on September 27, 2020 and June 28, 2021, respectively, currently hosted on the website www.marketfrauds.to, which the plaintiffs call the "Defamatory Manifestoes";
3. The Impugned Statements allege the plaintiffs violate securities regulations, manipulate social media, and secretly collude with journalists and activist short sellers to disseminate false stories about the small and mid-sized companies they trade in, especially in the Canadian cannabis and energy sectors;

4. The two “Defamatory Manifestoes” identify the plaintiffs’ trading in six specific companies as examples of this conduct:

- Aphria Inc. (“Aphria”): The plaintiffs received inside information about Aphria from their friendly relationship with Aphria’s management. In December 2018, they gave this inside information to Nate Anderson, the principal of prominent activist short selling research firm Hindenburg Research, to publish a negative report about Aphria while the plaintiffs were short. The plaintiffs then commissioned a positive report from market researcher Andrew Left of Citron Research to profit from their hedged long position in Aphria;
- Tilray Brands, Inc. (“Tilray”): In 2018, the plaintiffs lost \$80 million attempting to nakedly short Tilray after their prime broker at Toronto Dominion (“TD”) margin called them;
- Facedrive Inc. (“Facedrive”): In summer 2020, the plaintiffs held a large naked short position in Facedrive and commissioned Nate Anderson to write a negative report. Moez Kassam asked TD to place a fake sell offer on the TSX Venture Exchange to drive down Facedrive’s stock price. TD did so on July 24, 2020;
- Reconnaissance Energy Africa Ltd. (“Recon Africa”): In spring 2021, the plaintiffs had a large naked short position, and then increased this position by distributing shares acquired in a bought deal with their banks as collateral. The plaintiffs filed a false SEC complaint against Recon Africa and sent false information to National Geographic, the Globe & Mail and activist short seller Viceroy Research, who all published negative stories about Recon Africa;
- Genius Brands International Inc. (“Genius”): The plaintiffs held large amounts of Genius restricted stock they acquired in private financing they could not sell. They orchestrated a “long-short” campaign in June 2020, first disseminating false positive news about Genius. They then took a short position and fed inside information to Nate Anderson, who published a negative report about Genius. In July 2020, the plaintiffs colluded with a Minnesotan real estate agent to publish fake positive Genius stories on the website www.DisneyGuide.com;
- Zenabis Global Inc. (“Zenabis”): The plaintiffs held large amounts of Zenabis restricted stock. In late 2018, they convinced Zenabis’ management to appoint one of the plaintiffs’ former employees, Adam Spears, to the board of directors and to make Zenabis founders’ shares available for the plaintiffs to borrow. Adam Spears then leaked negative inside information to

the plaintiffs and the public and advised Zenabis to make poor business decisions, driving down its share price. The plaintiffs shorted Zenabis, covering with founders' shares;

5. Examinations for discovery of the parties and their representatives occurred in March and April 2023;

6. During those examinations, the plaintiff Moez Kassam, both in his personal capacity and as the representative of the corporate plaintiffs, gave certain undertakings and under advisements, which the plaintiffs have not properly or completely answered, and improperly refused to answer proper and relevant questions, as set out in the chart enclosed as Schedule "A";

7. On August 31, 2023, the plaintiffs provided answers to undertakings, under advisements, and refusals given at Mr. Kassam's examination for discovery. As set out in Schedule "A", many of these answers were incomplete, unresponsive, and/or improperly refused;

8. As set out in Schedule "A", these questions are relevant to the defendant James Stafford's alternative defences of truth, fair comment and/or justification;

9. As set out in Schedule "A", the plaintiffs' assertion of privilege over certain documents and answers is made improperly, and/or privilege has been waived, and the defendants James Stafford and Jacob Doxtator are entitled to have these questions answered and documents produced;

10. The defendants James Stafford and Jacob Doxtator are entitled to proper, complete, and responsive answers to the questions, which were proportionate, not overly broad, and relevant to the issues in this litigation, including the core allegations in the Impugned Statements;

11. It would be unfair to proceed to trial without having the plaintiffs' responses from the examinations for discovery within a reasonable time in advance thereof;

12. *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, including Rules 1.04, 30.06, 31.03, 31.05, 31.06, 31.07, 34.01, 34.10, 34.12, 34.14, 34.15, 37 and 39.02; and

13. Such further and other grounds as counsel may advise and this Honorable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

1. The Affidavit of Alexander Mulligan, sworn November 30th, 2023;
2. Supplemental affidavits, to be sworn and filed at a later date; and
3. Such further and other evidence as counsel may advise and this Honorable Court may permit.

Date: November 30th, 2023

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Court File No. CV-20-00653410-00CL

ANSON ADVISORS INC., et al.
Plaintiffs

-and-

STAFFORD, et al.
Defendants

DOXTATOR
Plaintiff to the Counterclaim

ANSON ADVISORS INC., et al.
Defendants to the Counterclaim

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Proceeding commenced at Toronto

NOTICE OF MOTION
(Motion to Compel Answers to Undertakings and Refusals)

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Robert Lee Doxtator and for the Defendants James Stafford
and Jacob Doxtator

TAB 1A

Outstanding Questions Posted at the Discovery Examination of the Plaintiff Moez Kassam on April 20 and 21, 2023

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
<i>Questions Relevant to the Plaintiffs' Claims, including their Pleadings and the Evidentiary Basis for their Claims</i>							
#9	UA	140-144	47-49	To advise of what evidence or documents the Plaintiffs have relating to the allegations in paragraphs 25, 26, 27, 28, 30, 53, 54, 64, 65, 69, 74, 81, 82, 83, 84, 85, 89, 90, 91, 92, 103, 105, 107, 108, and 139 to 140 of the Claim ¹	<p>The Plaintiffs rely on</p> <p>(a) the entirety of the documentary productions in this matter (which comprises over 1000 documents);</p> <p>(b) the extensive discovery evidence (including any answers to undertakings and questions taken under advisement to be provided by the Defendants);</p> <p>(c) information and documents obtained from third party production orders;</p> <p>(d) the findings and reports of expert witnesses that the Plaintiffs anticipate calling at trial; and</p> <p>(e) anticipated witness testimony at trial, among other things, to support the allegations set out in the Claim.</p> <p>With respect to the allegations in the identified paragraphs of the Claim, the particulars and basis for those allegations are described in detail in the Claim.</p>	<p>The answer is unresponsive.</p> <p>Mr. Stafford and Jacob Doxtator are entitled to know the case they have to meet, including the specific documents and information the Plaintiffs intend to rely on to prove their case.</p>	
#17	R	345–352	103–105	To advise whether Mr. Kassam is aware of any information which ties Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator other than the facts that	Without prejudice to the Plaintiffs' position that this is an improper question, the Plaintiffs note that the Claim provides a comprehensive description of the relationship(s) between Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator, as well as their respective conduct in connection with the defamatory	<p>The answer is unresponsive.</p> <p>Mr. Stafford and Jacob Doxtator are entitled to know the case they have to meet, including the documents and information the Plaintiffs intend to rely on to prove their case.</p>	

¹ Plaintiffs' Fresh as Amended Statement of Claim, issued May 27, 2022 ("FASOC"), Exhibit B to the Affidavit of Alexander Mulligan, sworn November 30, 2023 ("Mulligan Affidavit")

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				have been pleaded in the Claim ²	<p>statements and conspiracy, as known to the Plaintiffs at this time.</p> <p>In addition to the allegations particularized in the Claim, the Plaintiffs rely on (a) the entirety of the documentary productions in this matter (which comprises over 1000 documents); (b) the extensive discovery evidence (including any answers to undertakings provided by the defendants); (c) information and documents obtained from third party production orders; (d) the findings and reports of expert witnesses that the Plaintiffs anticipate calling at trial; (e) and anticipated witness testimony at trial, among other things, as the basis for linking Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator to the defamatory statements and conspiracy identified in the Claim.</p> <p>The full particulars of the defendants' relationships, and misconduct, are known only to the defendants.</p>		
#27	UA	516-519	148-149	To provide the identity of the investigators and their work product that Mr. Kassam is relying on to plead the conspiracy in this litigation.	<p>Without waiving any privilege, the Plaintiffs advise that they previously retained Artemis Risk and K2 Integrity through legal counsel. The Plaintiffs maintain privilege over all communications with the investigators and/or the investigators' work product.</p> <p>The balance of the question is refused on basis of privilege.</p>	<p>Mr. Stafford and Jacob Doxtator are entitled to know the evidence upon which the Plaintiffs intend to rely to prove their claims.</p> <p>No grounds for privilege given. Regardless, the Plaintiffs waived any privilege by producing and relying on part of their investigator's work product³</p>	

² FASOC, Exhibit B to the Mulligan Affidavit.

³ Maltego Report regarding the John Murphy Twitter Account @JohnMur670039142, generated by Artemis Risk Consulting for the plaintiffs on December 10, 2020 using the Maltego software (Production ID AAI00014600), Exhibit U to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
#30	R	576	167	To advise of the roles played by Mr. Stafford, Mr. Rudensky, Mr. Robert Lee Doxtator, and Mr. Jacob Doxtator in the conspiracy.	The particulars of the roles played by Mr. Stafford, Mr. Rudensky, Mr. Robert Doxtator and Mr. Jacob Doxtator will be known only to the defendants and their co-conspirators. Without prejudice to the Plaintiffs' position that this is an improper question, the Plaintiffs' understanding of the role played by each defendant is described throughout the Claim	Mr. Stafford and Jacob Doxtator are entitled to know the specific conduct they have allegedly committed, including how they have allegedly participated in a conspiracy to defame and harm the personal and business relationships of the Plaintiffs. Mr. Stafford and Jacob Doxtator are entitled to know the case they have to meet in order to mount a fulsome defence at trial.	
#38	R	677-679	198-199	To go through the Defamatory Manifesto Part 1 ⁴ and identify which statements about Anson's investment positions are true and which are false	The Plaintiffs refer to the Claim, which properly pleads defamation, including by pleading the defamatory words, meaning/sense and "sting" of the Defamatory Manifesto.	Answer given is not responsive. The Plaintiffs' FASOC does not plead which words from the Defamatory Manifesto Part 1 are defamatory, despite Mr. Kassam conceding at discovery that some statements in the Defamatory Manifesto are true at [196:16–197:2]. ⁵ Mr. Stafford and Jacob Doxtator are entitled to know the case they have to meet.	
#78	UT	1065	311	To identify, in advance of trial, all of the unlawful statements that the Plaintiffs intend to pursue at trial.	Since defamatory statements continue to be published by the defendants, the Plaintiffs will provide responses to this request at an appropriate time in advance of trial.	The Plaintiffs undertook to answer this question and have not done so. Mr. Stafford and Jacob Doxtator are entitled to know all of the Impugned Statements upon which the Plaintiffs base their claims in order to mount fulsome defences at trial.	

⁴ Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure, published September 29, 2020, hosted on www.moezkassam.com, Production ID AAI0000082 (the "Defamatory Manifesto Part 1"), Exhibit J to the Mulligan Affidavit.

⁵ Transcript of the Discovery Examination of Moez Kassam on April 20, 2023 ("April 20 Moez Kassam Transcript"), Exhibit N to the Mulligan Affidavit

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
#145	R	1491	410	To advise when Mr. Kassam retained Artemis Consulting.	Refused on the grounds of relevance and privilege.	Relevant to Mr. Stafford's right to bring a motion addressing the Blake Cassels & Graydon LLP ("Blakes") conflict expressly acknowledged in Conway J.'s Endorsement dated May 3, 2022. ⁶ The Plaintiffs' retention of Artemis establishes when they began investigating Mr. Stafford, and therefore when his confidential information was not secure from Blakes' Anson team.	
#151	R	1497	411-412	To advise when Anson started collecting evidence against Mr. Stafford in-house.	Refused on the grounds of relevance and privilege.	Relevant. See #145. Privilege improperly asserted and no grounds for privilege given.	
#161	R	1520-1521	417-418	To advise which email addresses Mr. Kassam searched through in order to prepare his Affidavit of Documents. ⁷	Refused on the basis of privilege. The review of the Plaintiffs' documents and records, as well as any production decisions, was carried out by the Plaintiffs' counsel in this action. As such, the specific search terms and parameters used to identify and determine relevance are subject to privilege. In any event, the Defendants refused to engage with the Plaintiffs on the terms of a discovery plan, in which the Plaintiffs had proposed the search terms and parameters to be employed for document production in this action.	Relevant to the completeness of the Plaintiffs' productions. Mr. Stafford and Jacob Doxtator are entitled to explore at discovery the process undertaken to compile the Plaintiffs' affidavit of documents. Privilege improperly asserted. The email addresses reviewed for relevant documents on behalf of the named and corporate plaintiffs is not solicitor-client or litigation privileged.	
#164	UT	1560	426	To produce the email from David Cynamon	There is no such email.	The Plaintiffs' answer contradicts Mr. Kassam's discovery testimony. Mr. Kassam confirmed	

⁶ Endorsement of Justice Conway granting the Plaintiffs' Motion for Leave to Amend the FASOC, dated May 3, 2022, Exhibit A to the Mulligan Affidavit.

⁷ Plaintiffs Affidavit of Documents, sworn by the Named Plaintiffs Moez Kassam on January 25, 2023, Exhibit L to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				providing the Defamatory Manifesto		in his response to Question 534 that he first became aware of the Defamatory Manifesto when Mr. Cynamon sent it to him [153:7-20]. ⁸ The undertaking request was for that communication between Mr. Kassam and Mr. Cynamon, whether it is an email or not. Alternatively, the Plaintiffs must correct Mr. Kassam's answer if he was mistaken at discovery	
<i>Questions Relevant to the Plaintiffs' Corporate Structure and Trading Practices</i>							
#10	UA	150	51	To provide a chart setting out how the various Anson Funds are related	The various Anson Funds have the same co-investment advisers (Anson Advisors Inc. and Anson Funds Management LP). They are otherwise not "related." The Anson Funds all generally follow a Cayman master/feeder structure, except for the Arch Anson Tactical Real Estate Fund and Arch Anson Tactical Real Estate NR Fund, which are both Ontario LPs and have a side-by-side structure.	The answer is not responsive to the undertaking requested. It does not identify what funds comprise the "Anson Funds" generally and does not include an organizational chart setting out their relationships with one another, through the investment advisers Anson Advisors Inc. and Anson Funds Management LP or otherwise.	
#36	UA	659	192	To provide a document evidencing the financial statements for Anson Advisors Inc., Anson Funds Management LP, and Anson Investments Master	Without prejudice to the Plaintiffs' position that this request is irrelevant, now produced as AAI00014790, AAI00014798, AAI00014805, AAI00014811, AAI00014815, AAI00014819, AAI00014837, AAI00014842, and AAI00014846 are the financial statements of the requested Anson entities from 2020-2022 ⁹	Answer provided is incomplete. The Plaintiffs have only produced financial statements from 2020 to 2022. Relevant to the Impugned Statements that contain specific allegations about the Plaintiffs' trading techniques in 2018 and	

⁸ April 20 Moez Kassam Transcript, Exhibit N to the Mulligan Affidavit.

⁹ Anson entities' financial statements for 2020-2022, Exhibit CC to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				Fund LP for years 2018 to present.		2019, including Tilray and Aphria. Relevant to quantification of the Plaintiffs' damages, including loss of goodwill as explained by Mr. Kassam during his examination [188:1-25]. ¹⁰ The 2018 and 2019 financial statements show, <i>inter alia</i> , the growth of the Plaintiffs' assets under management prior to and following the first Impugned Statements' publication.	
#77	R	1063	310	To produce all of the derivatives Anson has bought for any of the companies mentioned in the Defamatory Manifestos or MarketFrauds.to articles.	Refused on the grounds of relevance and overbreadth.	Relevant to Mr. Stafford's justification defence. These companies are listed at paragraph 134 of the Plaintiffs' Claim. ¹¹ Additionally, the Second Defamatory Manifesto includes a soundbite of Mr. Kassam saying, "So I know when stuff's gonna [sic] go down and I'll buy puts [i.e., put options, a derivative instrument]." ¹² The undertaking is proportionate and not overly broad.	
#85	R	1158-1162	336-337	Has Anson ever made a trade without assurances that the	As Mr. Kassam repeatedly advised during his examination, including at Page/Line	The question is relevant to Mr. Stafford's truth defence and the answer is unresponsive.	

¹⁰ April 20 Moez Kassam Transcript, Exhibit N to the Mulligan Affidavit.

¹¹ FASOC, Exhibit B to the Mulligan Affidavit: Zoom, Facedrive, GSX Techedu, Genius Brands International, Gamestop, RECO, Valorem Resources, Starr Peak Mining, Whole Earth Brands, United Lithium, Mountain Valley MD Holdings, SOL Global, Clean Power Capital Corp, Red White & Bloom, Moderna, Medivolve, AMM Power, Value Line, Champignon Brands, Medmen, and Zenabis.

¹² Moez Kassam & Anson Funds Part II: Rotten to the Core, dated June 28, 2021, hosted on www.marketfrauds.to, Production ID AAI00010037 (the "Defamatory Manifesto Part 2"), Exhibit K to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				short position could be covered.	<p>Reference [56:21]- [57:14],¹³ Anson is subject to the SEC and OSC rules applicable to short-selling, and to his knowledge has always complied with those rules.</p> <p>Anson otherwise relies on the prime brokerages with whom it engages, and on whom the responsibility ultimately lies for ensuring sufficient “borrow” to cover any short positions, in accordance with applicable rules. This is common, accepted industry practice.</p> <p>In any event, this question is largely speculative and unintelligible.</p>	Whether the Plaintiffs rely on their prime brokers is does not address the issue of whether the Plaintiffs have ever taken a short position without assurance they could cover it. As the Impugned Statements state the Plaintiffs took naked short positions in Tilray, Facedrive and Recon Africa, the question is relevant to their truth and is not speculative.	
<i>Questions Relevant to the Plaintiffs’ Dealings with Regulators, including the OSC and SEC</i>							
#39	UA	692-697	203-204	If Mr. Kassam or any of the Anson entities are under investigation by the SEC, to provide the particulars of what the allegations are.	<p>Since Anson operates in a regulated industry, it has, from time-to-time, received inquiries from regulatory authorities including the SEC.</p> <p>To the extent Anson is aware of the particulars of any allegations that might underlie any regulatory inquiries, any known allegations are irrelevant to the allegations raised in this action.</p>	<p>Relevant to Mr. Stafford’s justification defence and to the Plaintiffs’ damages. The Impugned Statements state that the SEC is investigating the Plaintiffs, including for trading on material non-public information. Any basis for the SEC’s investigations into the Plaintiffs are therefore relevant to the truth of the Impugned Statements.</p> <p>The bases of any SEC investigations into the Plaintiffs are relevant to the Plaintiffs’ reputations and therefore to the effect the Impugned Statements may have had on their reputation.</p>	

¹³ April 20 Moez Kassam Transcript, Exhibit N to the Mulligan Affidavit

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
#40	R	698-702	204-205	To advise, if Mr. Kassam or any of the Anson entities were under investigation by the SEC, would they be communicating that fact to their investors.	Without prejudice to the Plaintiffs' position that this is an improper question, see answer to Item #39, above. The remainder of the request is refused on the basis it is speculative and the premise of the question has not been established.	The question is not speculative ¹⁴ and is relevant to the Plaintiffs' alleged damages Whether the Plaintiffs' investors are aware of the bases for any SEC investigations is relevant to Plaintiffs' reputation and thus the effect the Impugned Statements may have had on that reputation.	
#41	R	708	208	To advise whether Mr. Kassam or any of the Anson entities had occasion to notify Anson's limited partners that Mr. Kassam and/or the Anson entities were under investigation by the SEC.	Without prejudice to the Plaintiffs' position that this is an improper question, see answer to Item #39, above. The remainder of the request is refused on the basis it is speculative and the premise of the question has not been established.	This question is not speculative (see #40 above) ¹⁵ and relevant to the Plaintiffs' damages. Whether the Plaintiffs' limited partners are aware of the bases for any SEC investigations into the Plaintiffs is relevant to Plaintiffs' reputation and therefore to the effect the Impugned Statements may have had on that reputation.	
#42	R	710	208-209	To advise if Mr. Kassam has received any notice of investigation from the SEC from 2018 to the current date.	See answer to Item #39, above.	This question is not speculative (see #40 and #41 above) ¹⁶ relevant to the Plaintiffs' damages and Mr. Stafford's justification defence. Whether the Plaintiffs have received an SEC notice of investigation is relevant to the Plaintiffs' reputation and therefore to the effect the	

¹⁴ See United States ("US") Securities and Exchange Commission ("SEC") Administrative Proceeding File No. #3-21782, Release No. 98755, *In a Matter of Anson Advisors Inc.*, dated October 19, 2023 and US SEC Administrative Proceeding News Release "SEC Charges Canadian Investment Adviser with Violating Trade Rule – Administrative Proceeding – File No. 3-21783", dated October 19, 2023, Exhibits DD and EE to the Mulligan Affidavit.

¹⁵ *Ibid.*

¹⁶ *Ibid.*

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						<p>Impugned Statements may have had on that reputation.</p> <p>The Impugned Statements state the SEC is investigating the Plaintiffs, and any notices of investigation the Plaintiffs have received are relevant to the truth of that statement.</p>	
<i>Questions Relevant to the Plaintiffs' Collaboration with Short Reporters and Journalists</i>							
#66	UA	953	275– 276	To produce the Plaintiffs' emails with Mr. Anderson that are listed on the Plaintiffs' Supplemental Schedule B1. ¹⁷	<p>For clarity, the Plaintiffs do not accept that any/all documents listed on Schedule B1 are relevant to any issue in the action. See answer to Item #65, above.</p> <p>However, as set out in the answer to Item #68 below, the Plaintiffs have now produced all relevant communications between Mr. Kassam and/or Anson and Mr. Anderson, including any such emails that were listed on the Plaintiffs' Supplemental Schedule B1.</p>	<p>The question is relevant to the truth of the Impugned Statements and Mr. Stafford's truth defence. The answer is incomplete.</p> <p>The Plaintiffs' Schedule B1 shows that in March 2018, the Plaintiffs exchanged emails with Mr. Anderson about Aphria,¹⁸ a company at issue in the Impugned Statements, which the Plaintiffs have not produced. As the Impugned Statements claim the Plaintiffs have regularly and secretly colluded and coordinated with activist short sellers like Mr. Anderson to publish negative stories about companies, they are shorting (like Aphria), these emails are relevant to the truth of the statements.</p> <p>No privilege attaches to these emails: they were sent in 2018, before any of the Impugned</p>	

¹⁷ Supplementary Affidavit of Documents of Moez Kassam, sworn April 4, 2023, Exhibit M to the Mulligan Affidavit.

¹⁸ *Ibid*; see e.g., BLK0000142, BLK00001525, BLK00001526, BLK00001529, BLK00001532, BLK00001533

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						Statements were even allegedly published.	
#101	R	1325	373	If not privileged, to produce the original emails mentioned above (Q. 1324 regarding communications between Sunny Puri, Joshua Fineman, Michael Roussel and Nate Anderson regarding Facedrive), including attachments, in their entirety ¹⁹	See answers to Items #65, 66 and 68, above. The balance of the question is refused on the grounds of relevance, proportionality, and overbreadth.	Relevant to Mr. Stafford's truth defence. The Impugned Statements claim the Plaintiffs were involved in writing the Hindenburg Research Facedrive report published July 23, 2020. The Plaintiffs have produced at Item #68 all the requested communications except five, which show the Plaintiffs' collaborated with Mr. Anderson to write the Hindenburg Facedrive report. As the Plaintiffs have produced all but five of the requested communications, ²⁰ this request is neither overbroad nor disproportionate. These communications are not litigation or solicitor-client privileged.	
#113	R	1371	384-385	To produce all of the communications that Mr. Kassam or anyone at Anson had with any journalists about Facedrive, ReconAfrica, Aphria, Zenabis, Harvest Health and HEXO.	As Mr. Kassam advised during his examination, he has regular discussions with business journalists regarding a wide variety of matters. The balance of the question, as posed, is refused on the grounds of relevance, proportionality, and overbreadth.	The question is relevant to Mr. Stafford's justification defence and the answer is unresponsive. The Impugned Statements state that Mr. Kassam discussed Recon Africa, Facedrive, and Aphria with journalists as part of a market manipulation strategy. The Plaintiffs have confirmed at Items 118–120 that they discussed these	

¹⁹ *Ibid*; see e.g., BLK00000217 to BLK00000227, BLK00000505 to BLK00000522, BLK00000942 to BLK00000953

²⁰ *Ibid*: BLK00000943 (and attachments BLK00000944 and BLK00000945); BLK00000505 (and attachment BLK00000506); BLK00000507 (and attachment BLK00000508); BLK00000509; and BLK00000226 (and attachment BLK00000227).

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						companies with journalists. The Plaintiffs' Schedule B-1 also confirms that they sent emails about Facedrive to Bloomberg News journalist Joshua Fineman. ²¹ Production of those communications is relevant to the truth of the Impugned Statements. The request is confined to specific companies and thus is not disproportionate or overbroad.	
#163	UA	1556-1559	424-425	To produce all of the relevant communications between Mr. Kassam or anyone at Anson and Adam Spears, Nate Anderson, Andrew Left and Ben Axler about the Defamatory Manifesto.	The Plaintiffs have conducted a diligent review of their records. Based on that review, there are no other relevant, non-privileged communications.	<p>The answer is incomplete. The Plaintiffs' affidavit of documents shows relevant, non-privileged communications exist.</p> <p>For instance, the Plaintiffs' Schedule B shows that Mr. Kassam received a ZIP Archive and Text File from Nate Anderson titled "Chat" on September 30, 2020, after the Defamatory Manifesto was allegedly published,²² but a month before the Plaintiffs retained counsel in this action on October 27, 2020.²³ As the Plaintiffs listed these communications in their Schedule B, the Plaintiffs have necessarily determined that those files are relevant to this lawsuit. It follows that any communications where</p>	

²¹ *Ibid*, BLK00000226, BLK00000227, BLK00000507, BLK00000508, BLK00000519, BLK00000520

²² Plaintiffs' AOD, Exhibit L to the Mulligan Affidavit, AAI00010132, AAI00010133, AAI00010134

²³ The Plaintiffs' answer Item #141, answer to questions 1486-1487 (p. 409): "Without waiving privilege, the Plaintiffs formally retained the Blakes law firm in this action on October 27, 2020". Exhibit P to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						Mr. Anderson sent those files to Mr. Kassam are also relevant. No privilege attaches to the ZIP Archive, the Text File, or any covering communications between Nate Anderson and Mr. Kassam. The dominant purpose of those documents was not for use in or advice on the litigation.	
<i>Questions Relevant to the Core Allegations in the Alleged Unlawful Statements, including both Defamatory Manifesto Parts 1 and 2, the impugned Stockhouse Posts, @BettingBruiser tweets, and John Murphy Tweets</i>							
#83	R	1143	332-332	To disclose Anson's positions in Aphria, Zenabis, ReconAfrica, HEXO and Facedrive during the period from 2018 to present.	<p>Now produced as AAI00026707²⁴ is Anson's relevant trading records for Aphria (see answer to Item #63, above).</p> <p>Now produced as AAI00026712²⁵ is Anson's relevant trading records for Zenabis (see answer to Item #34, above).</p> <p>Now produced as AAI00026711²⁶ is Anson's trading records for Recon Africa, for the relevant period surrounding the June 24, 2021 Viceroy Research report.</p> <p>Now produced as AAI00026710²⁷ is Anson's trading records for HEXO, for the relevant period surrounding the July 29, 2019 Friendly Bear report.</p> <p>Now produced as AAI00026708²⁸ is Anson's trading records for Facedrive, for</p>	<p>The answer is unresponsive. The produced documents are not official trading records and therefore do not accurately or completely represent the Plaintiffs' positions in the requested companies. The Plaintiffs arbitrarily imposed timeframes on this request without justification or explanation.</p> <p>The question is relevant to Mr. Stafford's justification defence. Zenabis is one of the core companies discussed in the Impugned Statements, in particular the Stockhouse posts and Defamatory Manifestoes.²⁹</p>	

²⁴ Anson Funds' Trading Data for Aphria Inc surrounding December 3, 2018, Exhibit X to the Mulligan Affidavit.

²⁵ Anson Funds' Trading Records for Zenabis Global Inc until April 23, 2020, Exhibit W to the Mulligan Affidavit.

²⁶ Anson Funds' Trading Records for Recon Africa surrounding June 24 2021, Exhibit Y to the Mulligan Affidavit.

²⁷ Anson Funds' Trading Records for HEXO surrounding July 29, 2019, Exhibit Z to the Mulligan Affidavit.

²⁸ Anson Funds' Trading Records for Facedrive surrounding July 23, 2020, Exhibit AA to the Mulligan Affidavit.

²⁹ Exhibits H, I, J and K of the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
					the relevant period surrounding the July 23, 2020 Hindenburg report. The balance of the question is refused on the grounds of relevance & overbreadth.	The requested records would show when the Plaintiffs took positions in the requested companies, the financial instruments through which they took those positions, and the brokerages and sources of those instruments.	
#97	R	1301-1310	368-369	To provide the terms of the participation and the subsequent short positions for all of the tickers (HEXO Corp., Tilray, Zenabis, Aphria, Harvest Health) where Anson participated in a private placement.	Without prejudice to the Plaintiffs' position that the question is irrelevant and overbroad, the Plaintiffs can advise as follows: <ul style="list-style-type: none"> Anson did not participate in a private placement in connection with HEXO Corp. Anson did not participate in a private placement in connection with Tilray. Anson participated in an October 2018 debenture offering in connection with Zenabis. Anson participated in a June 2018 and April 2019 private placement in connection with Aphria. With respect to any applicable trading records, see the answer to Item #83, above. The balance of the question is refused as irrelevant and overbroad.	The question is relevant to Mr. Stafford's truth defence and the answer is unresponsive. The Impugned Statements allege that Mr. Kassam's participation in each of these private placements was contingent on certain conditions, which conditions are not supplied in the answer. Producing the terms of Anson's participation in the Zenabis and Aphria private placements is not overbroad as, according to the Plaintiffs' answer, they only would apply to a total of three transactions regarding two specifically named companies.	
#111	R	1369	383-384	To provide, for each of the Anson accounts, the holding, trading, profit and loss records for the dealings with Facedrive, ReconAfrica, Aphria,	See answer to Item #83, above.	The question is relevant to Mr. Stafford's justification defence and the answer is not responsive to the question. This information is relevant to the truth of the Impugned Statements, which claim that the Plaintiffs have	

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				Zenabis, Harvest Health and HEXO.		traded in these companies across a network of affiliated funds. The records the Plaintiffs produced at Item #83 do not identify which Anson account held which securities in the requested companies ³⁰	
#114	R	1372	385	To produce any of the communications that Mr. Kassam and/or people from Anson had with anyone in management or directors for Facedrive, ReconAfrica, Aphria, Zenabis, Harvest Health and HEXO.	Refused on the grounds of relevance, proportionality, and overbreadth.	Relevant to Mr. Stafford's justification defence. The Impugned Statements state that the Plaintiffs developed relationships with Zenabis and Aphria management and used these relationships to manipulate the stocks and profit off their short positions.	
<i>Questions Relevant to the Core Allegations in Defamatory Manifesto Part 1</i>							
#34	UA	627-631	183-184	To produce Anson's trading records with respect to trades in Zenabis.	Now produced as AA100026712 ³¹ is Anson's trading records for Zenabis until April 23, 2020.	See #83 above.	
#81	R	1087	315-316	To produce all of Anson's records relating to trades in Zenabis shares.	See answer to Item #34, above.	See #83 above.	
#90	R	1245-1246	355-356	To produce any correspondence Mr. Kassam received from TD from 2018 to	Refused on the grounds of relevance, proportionality, and overbreadth.	Relevant to Mr. Stafford's justification defence. The Impugned Statements specifically state that on July 24,	

³⁰ Anson's Trading Records for Zenabis, Aphria, Recon Africa, HEXO and Facedrive, Exhibits W, X, Y, Z, and AA of the Mulligan Affidavit.

³¹ Anson's Trading Records for Zenabis, Exhibit W to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				April 21, 2023.		2020, TD put up a sell order for 75,400 shares of Facedrive for \$14.16 on TSX Venture and then pulled the order two minutes before markets opened as a favour to the Plaintiffs. Correspondence between TD and the Plaintiffs on this date are relevant to the truth of this statement.	
#99	UA	1318	371-372	To provide all of the records of all positions taken on Facedrive across all of the Anson Funds, including records of where Anson obtained the borrow to cover its short position.	Now produced as AAI00026708 ³² is Anson's relevant trading records for Facedrive (see answer to Item #83, above). As it relates to the "borrow", see answer to Item #88, above. The balance of the question is refused as irrelevant and overbroad.	See #83 above.	
#104	UA	1330	374	To produce all of the trading records for all of the Anson- related entities on Facedrive.	See answer to Item #99, above.	See #83 above.	
#139	UA	1479-1480	407-408	To produce documents indicating Anson's position on Genius Brands from April 2020 to December 2020.	Now produced as AAI00026709 ³³ are Anson's positions in Genius Brands, on a net aggregate basis, during the relevant period.	The question is relevant to Mr. Stafford's truth defence and the answer is unresponsive. The document produced only indicates that the Plaintiffs had a long "net aggregate position" on Genius Brands between April and December of 2020. It does not indicate whether Anson hedged this long position with any short positions during that time and	

³² Anson's Facedrive Trading Records, Exhibit AA to the Mulligan Affidavit.

³³ Anson's Genius Brand Trading Records, Exhibit BB to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						therefore is incomplete and unresponsive. The Impugned Statements and the FASOC allege that the Plaintiffs “took ‘significant short positions’ [in Genius] immediately prior to the release of a negative report that they commissioned Nate Anderson of Hindenburg Research to write”. ³⁴	
<i>Questions Relevant to the Core Allegations in Defamatory Manifesto Part 2</i>							
#62	UA	941-942	273-274	To advise of Anson’s short positions as at the time of publication of the Hindenburg Aphria Report. (referring to AAI00014703)	Anson had a net long equity position in Aphria at the time of the Hindenburg Aphria report published on December 3, 2018.	The question is relevant to Mr. Stafford’s truth defence and the answer is evasive and unresponsive. The answer only advises of the Plaintiffs’ <u>net</u> position at the time the report in question was published, not whether Anson was <u>delta short</u> during that time (see Mr. Kassam’s answer to Question 630 at [183:13–18]). ³⁵ The question is relevant to the truth of the claim in the Impugned Statements that the Plaintiffs shorted Aphria in advance of the Hindenburg report’s publication.	
#63	UA	945	274	To produce all records relating to Anson’s positions, holdings, profits and/or losses in	Now produced as AAI00026707 ³⁶ is Anson’s trading data for Aphria, for the relevant period surrounding the December 3, 2018 Hindenburg report.	See #83 above.	

³⁴ FASOC, Appendix E at para 61, Exhibit B to the Mulligan Affidavit.

³⁵ Transcript of Discovery Examination of Moez Kassam on April 21, 2023, Exhibit O to the Mulligan Affidavit.

³⁶ Anson’s Aphria Trading Records, Exhibit X to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				respect of Aphria for the years 2018 & 2019.			
#71	UA	989	285	To produce all communications between Mr. Kassam and/or Anson and any member of Aphria's management.	Refused on the grounds of relevance and overbreadth.	Relevant to Mr. Stafford's truth defence. The Impugned Statements state that Mr. Kassam obtained sensitive inside information from his friendly relationship with Aphria management.	
#93	UA	1257–1260	358–359	To check and advise whether Anson got RECO shares through a bought-deal financing.	Anson participated in an August 2020 public offering for RECO.	The question is relevant to Mr. Stafford's truth defence and the answer is not responsive to the question. The Plaintiffs' answer state that they participated in a <u>public offering</u> , and does not address whether the Plaintiffs participated in any <u>bought-deal financing</u> . As the Impugned Statements claim that the Plaintiffs acquired shares in Recon Africa through a bought-deal financing, this question is relevant to the truth of that statement.	
#94	UA	1268-1271	360	To advise where Anson got their borrow for Recon Africa.	See answer to Item #88, above ³⁷	The question is relevant to Mr. Stafford's truth defence and the answer is not responsive to the question. The records the Plaintiffs produced for Recon Africa do not indicate the various banks and accounts that they and/or their	

³⁷ Anson's Recon Africa Trading Records, Exhibit Y to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						brokers used for their Recon Africa holdings. As the Impugned Statements specifically claim that the Plaintiffs held a large short position in Recon Africa, received shares through Recon Africa's bought deal financing on May 5, 2021 and spread these shares amongst various banks to increase their permitted borrow on the stock, these account records are relevant to the truth of these statements.	
#107	R	1346-1349	378-379	To advise who lent Anson the funds in order to acquire the short position on ReconAfrica.	See answer to Item #94, above. ³⁸	See Item #94	
#109	UA	1363-1366	382-393	To advise what was the size of Anson's position on ReconAfrica before the release of the Viceroy report	Now produced as AAI00026711 is Anson's relevant trading records for ReconAfrica (see answer to Item #83, above)	See Item #83.	
#110	UA	1368	383	To produce records of all of the deposits and withdrawals of ReconAfrica securities for each of the Anson accounts.	See answer to Item #109, above. The balance of the question is refused on the grounds of relevance, proportionality, and overbreadth.	See Item #94.	

³⁸ *Ibid.*

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
<i>Questions Not Included in the Plaintiffs' Chart</i>							
NR ³⁹ #1	N/ A	694–695	203– 204	To advise whether any of the Anson entities is under investigation by the Securities and Exchange Commission [the “SEC”].	You know, given the size and scope of the fund and what we do, you know, there are -- you know, we are always -- you know, we're big player here and in the North American market, and as such, we get inquiries from time-to-time about from whole multitude of investigators and people and the like. It's just a matter of, you know, in terms of we get inquiries from time-to-time [sic].	<p>The question is relevant to the Plaintiffs' damages and Mr. Stafford's truth defence. The answer given is incomplete and unresponsive.</p> <p>The SEC announced on October 19, 2023, that it had reached a settlement with the Plaintiffs following an investigation into their improper trading.⁴⁰</p> <p>Any SEC investigations into the Plaintiffs are relevant to the Plaintiffs' reputations and therefore to the effect the Impugned Statements may have had on that reputation. They are also relevant to Mr. Stafford's justification defence, as the Impugned Statements state the SEC has investigated the Plaintiffs for improper trading.</p>	

³⁹ *i.e.*, Non-Responsive

⁴⁰ Exhibits DD and EE to the Mulligan Affidavit.

TAB 2

Court File No.: CV-20-00653410-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

B E T W E E N:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP and MOEZ KASSAM**

Plaintiffs

-and-

**JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR,
JACOB DOXTATOR, AND JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN
DOE 4 AND OTHER PERSONS UNKNOWN**

Defendants

A N D B E T W E E N:

ROBERT LEE DOXTATOR

Plaintiff by Counterclaim

-and-

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP, MOEZ KASSAM AND ALLEN SPEKTOR**

Defendants to the Counterclaim

AFFIDAVIT OF ALEXANDER MULLIGAN
(Sworn November 30, 2023)

**I, ALEXANDER MULLIGAN, of the City of Toronto, in the Province of Ontario,
MAKE OATH AND SAY:**

1. I am an associate at the law firm Kim Spencer McPhee Barristers P.C. (“KSM”), counsel to the defendant/plaintiff by counterclaim Robert Lee Doxtator (“Robert Doxtator”) and the defendants James Stafford (“Mr. Stafford”) and Jacob Doxtator in the within action and, as such, have knowledge of the matters to which I depose herein. To the extent that I do not have personal

knowledge of the matters to which I have deposed, and have obtained that information from others, I verily believe that information to be true.

2. I provide this affidavit in support of Mr. Stafford and Jacob Doxtator's motion to compel the plaintiffs to answer undertakings, under advisements, and refusals given during the examination of Moez Kassam ("Mr. Kassam") on April 20 and 21, 2023. In swearing this affidavit, it is not my intention to waive and there is no waiver of confidentiality or privilege.

3. At the time of swearing this affidavit, KSM represents Mr. Stafford, Jacob Doxtator and Robert Doxtator in the within action, but KSM has served and scheduled a motion to be removed as counsel of record for Robert Doxtator. As such, KSM is not acting for Robert Doxtator in this motion and is not bringing this motion on Robert Doxtator's behalf.

Background on this Action

4. The plaintiffs commenced this action on December 18, 2020, alleging that certain known and unknown individuals conspired to defame the plaintiffs and harm their personal and business reputations through a series of online posts. The plaintiffs seek \$111-million in damages for conspiracy, false light, intentional interference with economic relations, appropriation of personality, internet harassment, and defamation.

5. On May 3, 2022, the plaintiffs were granted leave to amend to add Mr. Stafford and Andrew Rudensky ("Mr. Rudensky") as defendants to the action. A true copy of Justice Conway's endorsement granting the plaintiffs' leave to amend is attached hereto as Exhibit "A".

6. Three of the four named defendants have defended the action: Robert Doxtator, Jacob Doxtator, and Mr. Stafford. The fourth named defendant, Mr. Rudensky, was noted in default in or around August 23, 2022, and default judgment was granted against him on the plaintiffs' defamation claim (only) on October 4, 2023 (see *Anson Advisors Inc, et al v Stafford, et al*, [2023 ONSC 5537](#)).

7. True copies of the plaintiffs' Fresh as Amended Statement of Claim (issued May 27, 2022, "FASOC"), Robert Doxtator's Amended Statement of Defence and Counterclaim (dated April 21, 2021), Jacob Doxtator's Amended Statement of Defence (dated August 10, 2022), and Mr. Stafford's Statement of Defence (dated June 28, 2022) are attached hereto as Exhibits "B", "C", "D", and "E", respectively.

8. In his Statement of Defence, Mr. Stafford relies on the alternative defences of truth, fair comment and/or justification.

Background on the Impugned Statements

9. The action concerns a series of allegedly defamatory statements about the plaintiffs (referred to in this affidavit as the “Impugned Statements”), namely:

- a. Tweets published on the Twitter accounts, @BettingBruiser and @JohnMur67039142 (display name “John Murphy), between August 2019 and October 31, 2020, attached hereto as Exhibits “F” and “G”, respectively;
- b. Posts on the message board www.Stockhouse.com (“Stockhouse”) by accounts called JusInTime, evtrader, Bundyj, and stocknsyrup on July 23 and August 14, 17, and 28, 2020, attached hereto as Exhibit “H”;
- c. Posts on Stockhouse by an account called ToffRaffles between November 1, 2020 and March 10, 2021, attached hereto as Exhibit “I”; and
- d. Two reports published online which the plaintiffs refer to as the “Defamatory Manifestoes”, currently hosted on www.marketfrauds.to, attached hereto as Exhibits “J” and “K”, respectively.

10. The Impugned Statements generally allege the plaintiffs engage in dubious activities that violate applicable regulatory requirements, and/or involve the manipulation of business and personal relationships, especially in the Canadian cannabis and energy sectors, and that the plaintiffs use social media manipulation and regularly collaborate with journalists and activist short sellers to manipulate stocks for their own financial benefit.

11. The two Defamatory Manifestoes provide specific examples of this conduct:

- a. The core allegations in the first Defamatory Manifesto (attached above as Exhibit J), involve the plaintiffs’ activities with Zenabis Global Inc (“Zenabis”), Genuis Brands International (“Genius”), Facedrive Inc (“Facedrive”), Aphria Inc (“Aphria”), and Tilray Brands, Inc (“Tilray”); and

- b. The core allegations in the second Defamatory Manifesto (attached above as Exhibit K) involve the plaintiffs' activities with Reconnaissance Energy Africa Ltd ("Recon Africa"), Genius, and Facedrive.

12. The examples of the plaintiffs' conduct involving these six companies, as set out in the first and second Defamatory Manifestoes, can be summarized as follows:

- Aphria: The plaintiffs received inside information about Aphria through their friendly relationships with Aphria's management. In December 2018, the plaintiffs gave this information to prominent activist short seller Nate Anderson of Hindenburg Research to publish a negative report while the plaintiffs were short. The plaintiffs then commissioned a positive report from market researcher Andrew Left of Citron Research to profit from their hedged long position in Aphria;
- Tilray: The plaintiffs lost \$80 million attempting to nakedly short Tilray after their prime broker at Toronto Dominion ("TD") margin called them;
- Facedrive: The plaintiffs held a large naked short position in Facedrive. They then gave Nate Anderson negative information to publish about the company. Mr. Kassam asked TD to place a fake sell offer on the TSX Venture to drive down the stock's price. TD did so on July 24, 2020;
- Recon Africa: In spring 2021, the plaintiffs had a large naked short position on Recon Africa. They then acquired Recon Africa shares through a bought deal financing, which they used as collateral with their banks to borrow more shares and further short Recon Africa. The plaintiffs filed a false regulatory complaint against Recon Africa with the SEC and sent false negative information to National Geographic, the Globe & Mail and activist short seller Viceroy Research, who all published negative Recon Africa stories;
- Genius: The plaintiffs held large amounts of Genius restricted stock they acquired in private financing they could not sell. They then orchestrated a "long-short" campaign in June 2020 by disseminated false positive news about Genius. Then they took a short position and fed negative inside information about the company to Nate Anderson, who published a negative report about Genius. In July 2020, the plaintiffs colluded with a Minnesotan real estate agent to distribute false positive stories about Genius on the website www.DisneyGuide.com; and

- Zenabis: The plaintiffs held large amounts of Zenabis restricted stock and developed close relationships with the company's management. In late 2018, they convinced management to appoint one of the plaintiffs' former employees, Adam Spears, to the board of directors and to make Zenabis founders' shares available for the plaintiffs to borrow. Adam Spears then leaked negative inside information to the plaintiffs and the public and advised Zenabis to make poor business decisions, driving down its share price. The plaintiffs shorted Zenabis, covering with founders' shares.

The Discovery Process

13. In December 2022, the plaintiffs, Jacob Doxtator, Robert Doxtator, and Mr. Stafford exchanged affidavits of documents and Schedule A productions. On or around January 25, 2023, the plaintiffs served an identical affidavit of documents sworn by the named plaintiff, Mr. Kassam. On April 4, 2023, the plaintiffs served a supplementary affidavit of documents sworn by Mr. Kasam. True copies of the plaintiffs' affidavit of documents and supplementary affidavit of documents are attached hereto as Exhibits "L" and "M".

14. Examinations for discovery occurred in the spring of 2023 as follows:

- a. Mr. Stafford on March 23, 2023;
- b. Jacob Doxtator on April 11, 2023;
- c. Robert Doxtator on April 14, 2023; and
- d. Mr. Kassam on April 20-21, 2023.

15. I attended all of the discovery examinations in-person and/or virtually via Zoom videoconference.

16. Mr. Kassam was examined in both his personal capacity and as the representative of the corporate plaintiffs, Anson Advisors Inc., Anson Funds Management LP, and Anson Investments Master Fund LP. True copies of the transcripts from Mr. Kassam's examinations on April 20 and 21, 2023 are attached hereto as Exhibits "N" and "O" ("Mr. Kassam's Transcripts").

17. During the course of his examination, Mr. Kassam gave undertakings and under advisements, and refused to answer certain questions. On August 31, 2023, the plaintiffs provided answers to the undertakings, under advisements, and refusals given at Mr. Kassam's examination,

which is attached hereto as Exhibit “P”. Attached hereto as Exhibit “Q” is a chart of outstanding relevant questions that the plaintiffs improperly refused to answer and/or did not provide complete responses to, which Mr. Stafford and Jacob Doxtator are seeking to compel the plaintiffs to properly answer in this motion (also Schedule A to the Notice of Motion).

18. I am advised by Won J. Kim, Principal of KSM, and believe that further examinations will be necessary as a result of the answers given by Mr. Kassam during his examination and by the plaintiffs’ answers to undertakings, under advisements, and refusals (attached above as Exhibit P). I am also advised by Mr. Kim and believe that further examinations will be necessary as a result of the answers that the plaintiffs may be ordered to give as a result of this motion.

Documents Put to Mr. Kassam During his Discovery

19. Several documents were put to Mr. Kassam during his discovery examination on April 20 and 21, 2023, including the following:

- a. Affidavit of Sunny Puri, sworn January 5, 2022 in support of the plaintiffs’ motion seeking leave to amend the FASOC and add Messrs. Stafford and Rudensky as Defendants (exhibits excluded), attached hereto as Exhibit “R”;
- b. WhatsApp chat between Robert Doxtator and Mr. Kassam, dated July 6, 2019 (Production ID AAI00010536), attached hereto as Exhibit “S”;
- c. Hindenburg Research Report, authored by Nate Anderson, entitled “Aphria: A Shell Game with a Cannabis Business on the Side”, dated December 3, 2018 (Production ID AAI00014703), attached hereto as Exhibit “T”;
- d. Maltego Report regarding the John Murphy Twitter account (JonMur670039142), generated by Artemis Risk Consulting for the plaintiffs on December 10, 2020 using the Maltego software (Production ID AAI00014600), attached hereto as Exhibit “U”; and
- e. Email from Mr. Kassam to Ebrahim El Kalza with subject line “FW: response” on September 30, 2020 (Production IC AAI00010136), attached hereto as Exhibit “V”.

The Plaintiffs' Supplementary Productions of August 31, 2023

20. On August 31, 2023, as part of their responses to undertakings, under advisements, and refusals given during Mr. Kassam's examination, the plaintiffs provided supplementary productions, including the following:

- a. Anson Funds' trading records for Zenabis until April 23, 2020 (Production ID AAI00026712), produced in response to questions 627-361(pages 183-184) of Mr. Kassam's Transcripts, attached hereto as Exhibit "W";
- b. Anson Funds' trading data for Aphria "for the relevant period surrounding the December 3, 2018 Hindenburg Report" (Production ID AAI00026707), produced in response to question 1143 (pages 332-332) of Mr. Kassam's Transcripts, attached hereto as Exhibit "X";
- c. Anson Funds' trading records for Recon Africa "for the relevant period surrounding the June 24, 2021 Viceroy Research report" (Production ID AAI00026711), produced in response to question 1143 (pages 332-332) of Mr. Kassam's Transcripts, attached hereto as Exhibit "Y";
- d. Anson Funds' trading records for HEXO Corp. "for the relevant period surrounding the July 29, 2019 Friendly Bear report" (Production ID AAI00026710), produced in response to question 1143 (pages 332-332) of Mr. Kassam's Transcripts, attached hereto as Exhibit "Z";
- e. Anson Funds' trading records for Facedrive "for the relevant period surrounding the July 23, 2020 Hindenburg report" (Production ID AAI00026708), produced in response to question 1143 (pages 332-332) of Mr. Kassam's Transcripts, attached hereto as Exhibit "AA";
- f. Anson Funds' trading records for Genius Brands "on a net aggregate basis, during the relevant period" (Production ID AAI00026709), produced in response to questions 1479-1480 (pages 407-408) of Mr. Kassam's Transcripts, attached hereto as Exhibit "BB"; and
- g. Anson entities' financial statements from 2020-2022 (Production IDs AAI00014790, AAI00014798, AAI00014805, AAI00014811, AAI00014815, AAI00014819, AAI00014837, AAI00014842, and AAI00014846) produced in response to question 659 (page 192) of Mr. Kassam's Transcripts, attached hereto as Exhibit "CC".

Other Relevant Documents

21. The following publicly available documents pertain to Mr. Kassam's answers to undertakings, under advisements, and refusals relating to his discovery examination:

- a. The US Securities and Exchange Commission ("SEC") Administrative Proceeding File No. #3-21783, Release No. 98775, *In the Matter of Anson Advisors Inc*, dated October 19, 2023, attached hereto as Exhibit "DD";
- b. The US SEC Administrative Proceeding News Release "SEC Charges Canadian Investment Advisor with Violating Trade Rule – Administrative Proceeding – File No. 3-21783", dated October 19, 2023, attached hereto as Exhibit "EE";
- c. Globe and Mail Article "Aphria reveals some directors in Latin American Acquisition had 'conflict'", authored by David Milstead, published February 15, 2019, attached hereto as Exhibit "FF";
- d. Globe and Mail Article, "Aphria's dealmaker: How a self-described outsider found himself in the hot seat", authored by Christina Pellegrini, David Milstead, and Mark Rendell, published January 5, 2019, attached hereto as Exhibit "GG";
- e. Globe and Mail Article, "RCMP investigating Canadian oil company Recon Africa after complaints of alleged corruption and fraud", authored by Geoffrey York, published July 22, 2022, attached hereto as Exhibit "HH";
- f. Globe and Mail Article, "'Phenomenal riches': Inside Recon Africa's aggressive stock promotion campaign", authored by Geoffrey York and Niall McGee, published June 20, 2021, attached hereto as Exhibit "II";

SWORN BEFORE ME at the City
of Toronto, in the Province of Ontario,
this 30th day of November, 2023



A Commissioner for Taking Affidavits

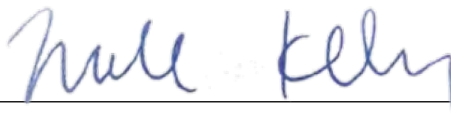
LSO #84488D



Alexander T. Mulligan

TAB 2A

This is **Exhibit “A”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Mulligan Kelly", is written over a horizontal line.

A Commissioner for Taking Affidavits
LSO #84488D

Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE)	TUESDAY, THE 3RD
)	
JUSTICE CONWAY)	DAY OF MAY, 2022

B E T W E E N:

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP and MOEZ KASSAM

Plaintiffs

and

ROBERT LEE DOXTATOR, JACOB DOXTATOR, JOHN DOE 1, JOHN
DOE 2, JOHN DOE 3, JOHN DOE 4 and PERSONS UNKNOWN

Defendants

ORDER

THIS MOTION, made by the Plaintiffs, Anson Advisors Inc., Anson Funds Management LP, Anson Investments Master Fund LP and Moez Kassam (the “**Anson Parties**”), for leave to amend their Statement of Claim in this proceeding in the form appended hereto as **Schedule A** (the “**Amended Claim**”), including by adding James Stafford (“**Stafford**”) and Andrew Rudensky (“**Rudensky**”) as Defendants to the action, was heard this day by videoconference.

ON READING the Motion Record of the Anson Parties dated January 18, 2022, the Factum of the Anson Parties dated April 19, 2022, the Book of Authorities of the Anson Parties dated April 19, 2022, the Responding Motion Record of Stafford dated March 30,

-2-

2022, the Factum of Stafford dated April 26, 2022, and the Book of Authorities of Stafford dated April 26, 2022, and on being advised that no party or proposed Defendant other than Stafford opposes the motion, despite being properly served, and on hearing the submissions of the lawyers for the Anson Parties and Stafford,

1. THIS COURT ORDERS that leave to issue the Amended Claim and add Stafford and Rudensky as Defendants to this action is granted.
2. THIS COURT ORDERS that such leave is granted without prejudice to the ability of Stafford to raise any of the issues argued at the hearing or bring any other motions at a subsequent stage in these proceedings.
3. THIS COURT ORDERS that partial indemnity costs on the motion are awarded to the Anson Parties in the amount of \$20,000 against Stafford. Stafford shall pay the Anson Parties these costs within 30 days of the date of this Order.



Justice Conway

Electronically filed / Déposé par voie électronique : 21-Mar-2024
Toronto Superior Court of Justice / Cour supérieure de justice
ANSON ADVISORS INC. et al.
Plaintiffs

Court File No./N° du dossier du greffe : CV-20-00653410-00CL
-and- **ROBERT LEE DOXTATOR et al.**
Defendants

Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO

ORDER

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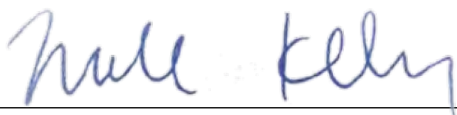
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Lawyers for the Plaintiffs,
Anson Advisors Inc., Anson Funds Management LP, Anson
Investments Master Fund LP and Moez Kassam

TAB 2B

This is **Exhibit “B”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Mulligan Kelly", is written above a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

X
X

C

Court File No. CV-20-00653410-00CL

Justice Conway

May 3, 2022

Christina
Irwin

Digitally signed by Christina Irwin
DN: cn=Christina Irwin, o=Ministry of the
Attorney General, ou=Superior Court of
Justice, email=christina.irwin@ontario.ca,
c=CA
Date: 2022.05.27 13:50:25 -0400

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

B E T W E E N:

(Court Seal)

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP,
ANSON INVESTMENTS MASTER FUND LP AND MOEZ KASSAM

Plaintiffs

- and -

JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR,
JACOB DOXTATOR, AND JOHN DOE 1, JOHN DOE 2, JOHN DOE 3,
JOHN DOE 4 AND OTHER PERSONS UNKNOWN

Defendants

FRESH AS AMENDED STATEMENT OF CLAIM

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The Claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a Statement of Defence in Form 18A prescribed by the *Rules of Civil Procedure*, serve it on the Plaintiff's lawyer or, where the Plaintiff does not have a lawyer, serve it on the Plaintiff, and file it, with proof of service in this court office, WITHIN TWENTY DAYS after this Statement of Claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your Statement of Defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a Statement of Defence, you may serve and file a Notice of Intent to Defend in Form 18B prescribed by the *Rules of Civil Procedure*. This will entitle you to ten more days within which to serve and file your Statement of Defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date _____ Issued by _____
Local Registrar

Address of Superior Court of Justice
court office: 330 University Avenue, 9th Floor
Toronto ON M5G 1R7

TO: Robert Lee Doxtator
184 Albert Street
Belleville, ON
K8N 3N4

Jacob Doxtator
1150 Salem Road
Prince Edward, ON
K0K 1T0

James Stafford
Address Unknown

Andrew Rudensky
1107 Melvin Ave
Oakville, ON L6J 2V8

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CLAIM

1. The Plaintiffs, Anson Advisors Inc. (“**AAI**”), Anson Funds Management LP (“**AFM**”), Anson Investments Master Fund LP (“**AIMF**” and, together with AAI and AFM, “**Anson**”) and Moez Kassam (“**Kassam**”), claim against the Defendants, James Stafford, Andrew Rudensky, Robert Lee Doxtator, Jacob Doxtator, John Doe 1, John Doe 2, John Doe 3, John Doe 4 and other persons unknown (the “**Defendants**”), jointly and severally, for:

- (a) general damages in the amount of \$100,000,000 for conspiracy, publicity that places the plaintiffs in a false light, intentional interference with economic relations, appropriation of personality, internet harassment, and defamation;
- (b) aggravated damages of \$1,000,000;
- (c) punitive or exemplary damages of \$10,000,000;
- (d) special damages to be proven at trial;
- (e) fees and costs incurred by the Plaintiffs in investigating the persons involved in the Conspiracy (as defined below), and removing the Unlawful Statements (as defined below), in amounts to be proven at trial;
- (f) a mandatory order compelling the Defendants to remove the publications complained of in this action from all Internet websites, online message boards and social media platforms within their control;
- (g) an interim, interlocutory and permanent injunction restraining the Defendants or anyone with notice of the order from republishing the

publications complained of in this action or the Unlawful Statements (as defined below), or publishing further unlawful and defamatory statements about Anson and its current and past personnel;

- (h) pre-judgment interest in accordance with section 128 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended;
- (i) post-judgment interest in accordance with section 129 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended;
- (j) the costs of this proceeding on the highest allowable basis, plus all applicable taxes; and
- (k) such further and other relief as to this Honourable Court may seem just.

2. Since at least the summer of 2019 and intensifying to the present, the Defendants James Stafford, Andrew Rudensky, Robert Lee Doxtator and Jacob Doxtator have engaged in a scheme with each other and other unknown persons to damage the business and reputations of a successful securities business, Anson, and its founder, Moez Kassam. Specifically, the Defendants conspired to falsely and repeatedly claim that Kassam is a criminal and that he and his businesses are engaged in conduct that is illegal, unethical, and contrary to Canadian and United States securities regulations. The Defendants have, for example, published or encouraged the publication of the following false and defamatory statements:

- (a) “Moez Kassam and his Anson Funds have systematically engaged in capital market crimes, including insider trading and fraud, to rob North American shareholders of countless millions”;
- (b) “Anson Funds and Moez Kassam have been destroying companies through illegal means...”;
- (c) Kassam is a “corrupted and criminal CIO [Chief Investment Officer] at Anson funds”;
- (d) “If you r [sic] an Anson Fund investor ... be prepared to have your funds locked up b/c there is a lot information floating out there that paints a picture of scams to benefit none other then Moez Kassam”;
- (e) “In his attempt to destroy small-cap Canadian companies through nefarious means, a string of feeder funds and untraceable payments to elude regulators, Moez Kassam has betrayed even his closest friends”;
- (f) Kassam pursued “questionable and illegal activities” in “an attempt to make money by destroying small companies and the lives of anyone who happened to get in his way: even those who helped him and ended up being disposable”;
- (g) “Moez Kassam & Sunny Puri of Anson . . . put out the report to manipulate the market so they could cover an already short position”;

- (h) “... dirty moez [sic] hurt his business parnter [sic] and lied to the founders of \$apha [Aphria Inc.]”;
- (i) Kassam and Anson “just use people and don’t pay anyone but themselves”;
- (j) “Moez has even threatened all Anson employees with lawsuits and installed draconian measures in the office to stop leaks from employees. The fear level is rising—fast. At this point, it is becoming clearer that employees will either sink with this ship or be fired, and now the latter is starting to look more attractive than the former”; and
- (k) the OSC and SEC have “[begun] a full investigation into Anson Funds business practices (according to sources inside Anson)”.

3. Statements accusing the Plaintiffs of illegal and unethical conduct, including market manipulation, fraud, insider trading, breaches of applicable securities law and regulations, and cyber crimes, are false and defamatory. This lawsuit seeks to hold the Defendants accountable for the economic, reputational, and emotional harm their lies have caused.

A. THE PLAINTIFFS

4. AAI is a corporation incorporated under the laws of Ontario. It is a private asset management firm that serves as the co-investment adviser, exempt market dealer, and portfolio manager to several investment funds in which private investors may invest their capital (collectively, the “**Anson Funds**”). It is regulated by the United States Securities

and Exchange Commission (“**SEC**”) and the Ontario Securities Commission (“**OSC**”), among other regulatory bodies.

5. AFM is a Texas limited partnership that serves as the investment fund manager for the Anson Funds. It is regulated by the SEC and the OSC.

6. AIMF is a Cayman Islands exempted limited partnership. It is Anson Funds’ flagship investment fund. The Anson investments that are the subject of the Unlawful Statements (as defined below) were undertaken by AIMF.

7. Anson uses multiple strategies to execute its investment program, including both long and short investment strategies and opportunistic investments. One subset of Anson’s short investment strategies includes short selling securities that have been overvalued by the public markets. One way in which securities can become overvalued is through fraudulent “pump and dump” schemes. In a pump and dump scheme, the perpetrators attempt to inflate the value of a stock that they own by making and/or publicizing false or misleading positive statements about the company whose stock is being traded, and then enrich themselves at the cost of other shareholders, including but not limited to by way of selling stock, paying inflated salaries, or paying parties related to the perpetrators inflated amounts without proper disclosure.

8. Short selling is a legitimate investment strategy that involves borrowing shares from a dealer and selling them in anticipation that the share price will decline. The borrower must later repurchase the shares in order to return them to the lender. If the share price has fallen by the time the borrower repurchases the shares for return, the borrower will earn a profit. By contrast, if the shares increase in value while the borrower

holds a short position, the borrower will be required to repurchase the shares at the increased price, causing a loss.

9. Short selling, as a trading activity, is subject to a well-developed regulatory regime in Canada.

10. Anson conducts and reviews research and due diligence on the market and relevant companies to inform its trades, all based on publicly available information. When Anson determines that the stock of a public company may be overvalued and/or conducts short sales, its scrutiny may threaten individuals who perpetrate pump-and-dump and other fraudulent securities schemes, or who otherwise benefit from inflated securities. Anson complies with all applicable investment rules and regulations in all trading transactions it undertakes.

11. A “naked” short sale is a colloquial term that is generally understood to refer to when an investor sells shares in anticipation that their price will decline without first having a reasonable belief that it can borrow the shares that it sold. Anson does not engage in naked short selling, and as described above complies with all applicable investment rules and regulations.

12. The capital markets rely on the free flow of public information about publicly traded companies. Further, publication of analyses of public companies is a routine feature of the capital markets, including where the entity publishing the analysis has made an investment (either short or long) in the securities of the company in question. In the ordinary course of its business, Anson from time to time discusses its research and investment analyses and theses with others in the industry. This is done to conduct

research, stress test due diligence and investment theories, learn potentially variant points of view and solicit other independent analyses. To the extent analyses that are published by others align with Anson's – or other investment funds' – views, this is simply the result of various individuals involved in the capital markets independently reaching the same conclusions based on the same publicly available information.

13. Moez Kassam is a founder of Anson, and a director and the principal, Chief Executive Officer and Chief Investment Officer of AAI. Kassam is 41 years old. He founded Saunders Capital Master Fund LP, the predecessor to AIMF, in July 2007 at the age of 26, and has since built Anson into a billion-dollar investment firm. In 2018, Kassam was named to Canada's Top 40 Under 40 for extraordinary achievement in business and philanthropy. He is an executive member of the Young Presidents Organization's Maple Leaf Chapter, and previously served on its board as Education Officer. He sits on the boards of directors of the Canadian Olympic Foundation, Toronto Public Library Foundation, Friends of Aseema, and Kids Cook to Care. He also serves as a line of credit guarantor for Windmill Microlending, which supports immigrants and refugees who come to Canada with education, skills and experience but struggle to resume their careers here.

14. Through the Moez & Marissa Kassam Foundation, Kassam has donated millions of dollars to Canadian charitable causes, including the Sunnybrook Foundation, the SickKids Foundation, Community Food Centres Canada, the Michael Garron Hospital Foundation, the Canadian Foundation for AIDS Research (CANFAR), Together We Stand Foundation, the Institute for Canadian Citizenship, the South Asian Legal Clinic of Ontario and many others. In fiscal year 2021 alone, the Moez & Marissa Kassam Foundation donated over one million dollars to various Canadian charitable entities.

15. Kassam provides advice with respect to AIMF and all of Anson's other funds under management and is ultimately responsible for Anson's investment strategy, trading, and overall investment performance. Kassam is the face of Anson and is well known in the industry as such.

B. THE DEFENDANTS

16. The Defendant James Stafford ("**Stafford**") is the principal of A Media Solutions Limited, a private company that was incorporated in 2012 and is registered in England and Wales, which operates the website www.OilPrice.com. He is also the principal of Advanced Media Solutions, a company incorporated in the British Virgin Islands, which owns www.OilPrice.com. Although Stafford styles himself as a "journalist", "publisher" and "editor" of www.OilPrice.com, he is, in fact, a stock promoter. Stafford has made millions of dollars as a stock promoter by writing sensationalist yet glowing articles about companies that advertise with him. Despite extensive efforts to attempt to identify Stafford's residential address, the Plaintiffs do not know Stafford's address and do not know where he resides. Stafford appears to have connections to numerous jurisdictions and it is unknown to the Plaintiffs whether Stafford's residential address is in Mexico, England, the Bahamas, or elsewhere. He maintains operations in Mexico and has a business registered there; at least four employees of www.OilPrice.com are based in Mexico; several of the Unlawful Statements (as defined below) were published from Mexico on the website Stockhouse (which provides market news and analysis regarding companies with small market capitalizations, as well as message boards for users to discuss securities issuers) as discussed in paragraphs 53 to 61 below and in **Appendix "C"** at section C; and Stafford himself, using the Stockhouse account "ToffRaffles" (which

is linked to one of his email addresses) published Unlawful Statements on Stockhouse from an IP address originating in Mexico (as discussed in paragraph 106 below). For further information on Stafford's background, companies and possible location, see **Appendix "C"** at sections A and C.

17. The Defendant Andrew Rudensky ("**Rudensky**") resides in Toronto, Ontario. Rudensky is a partner of The Delavaco Group, a small merchant bank with a historical working relationship with Stafford. Rudensky previously worked as an advisor at Richardson GMP Limited from November 2009 until September 2015.

18. In July 2018, the Investment Industry Regulatory Organization of Canada ("**IIROC**") found that Rudensky had violated IIROC Dealer Member Rules by engaging in personal financial dealings with one of his clients and by making false and misleading representations to his firm. Rudensky had borrowed \$3 million from a client to finance a trade and misrepresented the source of the funds to Richardson GMP Limited. IIROC found that Rudensky's "misconduct and lack of honesty harmed market integrity and the reputation of the marketplace. He breached the fundamental principle of trust in the business." IIROC ultimately suspended Rudensky from his IIROC registration for two years, ordered him to pay fines and disgorgement totalling \$55,923, and ordered him to pay IIROC's costs of \$24,500. The Ontario Securities Commission upheld that decision upon review.

19. The Defendant Robert Lee Doxtator ("**Robert**") resides in Belleville, Ontario. He is a founder of Harvest Moon Cannabis Company (a company providing research and due diligence services) and is a business development consultant in the cannabis industry. In

the past, Robert has shared due diligence with Anson. Robert operates a Twitter account under the username @BettingBruiser. It has over 14,000 followers. The “Betting Bruiser” Twitter profile states: “@HarvestMoon420 Founder -#Potstocks Legal & Business Development Consultant Inquiries: HarvestMoonCannabisCo@gmail.com.” It is well known in the Canadian investment industry that “Betting Bruiser” is Robert.

20. Robert, as “Betting Bruiser”, is a prolific Twitter user and has repeatedly used his Twitter account to publish offensive content, including content disparaging of immigrants, women and members of the LGBT community.

21. While Robert holds himself out to be a lawyer, including in posts on the “Betting Bruiser” Twitter account, there is no record of his being admitted to practice law in any province or territory of Canada.

22. The Defendant Jacob Doxtator (“**Jacob**”) is the cousin of Robert. He also resides in Belleville, Ontario. He operates, in coordination with Robert, a Twitter account through an alter-ego named “John Murphy” under the username @JohnMur67039142. Unlike with “Betting Bruiser”, it is not commonly known that Jacob operates the “John Murphy” Twitter account. The Defendants went out of their way to use this account to conceal their identities as part of their scheme against Anson. Although Jacob lives in Belleville, the Twitter account states that “John Murphy” lives in the state of Georgia in the United States. The John Murphy account was removed from Twitter in or around March 2021, after this claim was brought and Jacob was served.

23. The Defendants John Doe 1, John Doe 2, John Doe 3, John Doe 4 and other persons unknown (the “**Unknown Defendants**”) are individuals whose identities are

presently unknown, but who are believed to have the means and business motivation to seek to harm the Plaintiffs. The Unknown Defendants may reside in the United States or elsewhere outside of Canada. The Plaintiffs will substitute the actual names of these Defendants after they have been discovered.

24. More generally, the Plaintiffs reserve their right to make, or seek to make, amendments to this pleading to incorporate additional material facts and information that they discover.

C. OVERVIEW OF CLAIM

25. Stafford, Rudensky, Robert, Jacob (Robert and Jacob together are referred to as the “**Doxtators**”) and the Unknown Defendants are parties to a sophisticated, coordinated scheme to damage the Plaintiffs’ business and reputations (the “**Conspiracy**”).

26. In particular, and as described further below, in furtherance of this Conspiracy, the Defendants maliciously and intentionally entered into an agreement to conspire with one another and committed acts with the predominant purpose of injuring the Plaintiffs by damaging their business and reputations. In addition, or in the alternative, in furtherance of this Conspiracy, the Defendants have acted in a concerted and coordinated effort while using unlawful means aimed at the Plaintiffs, including but not limited to acts that amount to defamation at law, when they knew, or ought to have known, that significant harm to the Plaintiffs would result. In fact, the Defendants have caused significant damage to the Plaintiffs’ business and reputations through their unlawful, improper conduct. Furthermore, the Defendants took sophisticated steps to conceal their identities and advance the Conspiracy anonymously (using, among other things and as described

further below, offshore web developers based in Bosnia and Herzegovina, temporary “burner” email addresses, virtual private networks (“**VPNs**”), fake identities, anonymous Twitter profiles, and more) because they knew that they were engaged in unlawful conduct. The Defendants are savvy about capital markets and deliberately fabricated allegations about the Plaintiffs – or at best were reckless as to whether the allegations were false – in order to sabotage their business. In addition, some or all of the Defendants are routinely engaged in pump and dump schemes and publicly blame the Plaintiffs when the artificially inflated share prices of the companies at issue ultimately return to their lower, intrinsic levels.

27. In the Conspiracy, Stafford, Rudensky and the Doxtators coordinated and agreed with one another and with the Unknown Defendants to harm the Plaintiffs through a carefully planned and executed plot. This plot has included fabricating, spreading and publicizing a series of unlawful, abusive, false, malicious, harassing and defamatory statements about Anson, Kassam and other individuals connected with Anson (the “**Unlawful Statements**”), including by first publishing defamatory comments on the website Stockhouse, and then on a series of websites generated by the Defendants, as set out below, in an attempt to manufacture a narrative to harm Anson and Kassam; hiring freelance web developers based in Bosnia and Herzegovina to register the websites on which Unlawful Statements were posted, for the purpose of concealing the Defendants’ identities; taking other sophisticated steps to obscure their identities while disseminating Unlawful Statements, including hiring Bosnian developers, using VPNs, burner email addresses and false identities; sending targeted communications containing the Unlawful Statements via email, including to reporters, as well as disseminating the Unlawful

Statements on Twitter, Reddit and other platforms; and attempting to improperly attract media attention to the Unlawful Statements. Moreover, the Defendants have sought to disseminate the Unlawful Statements internationally to individuals in (at least) the United States (where the Plaintiffs do business) as well as in Canada, with the intention of causing maximum, widespread harm to the Plaintiffs.

28. Steps taken by the Defendants pursuant to the Conspiracy include the following:

- (a) in summer 2019, some or all of the Defendants, and in particular Robert, began a campaign to spread Unlawful Statements about the Plaintiffs on Twitter through Robert's "Betting Bruiser" Twitter account;
- (b) in July and August 2020, in a further concerted and coordinated effort, the Defendants increased their efforts and conspired to post Unlawful Statements on message boards on the website Stockhouse. These Unlawful Statements were viewed by many thousands;
- (c) beginning on or around September 27, 2020, after the Plaintiffs took steps to have the Unlawful Statements on Stockhouse removed, the Defendants conspired to anonymously write, publish and disseminate a lengthy Internet post containing Unlawful Statements about the Plaintiffs (the "**Defamatory Manifesto**") on a series of websites. The Plaintiffs believe that Stafford led the effort to draft and publish the Defamatory Manifesto, including because Stafford styles himself a "journalist" and is often hired as a promoter of stocks – including those mentioned in the Defamatory Manifesto – in pump and dump schemes, with the aim of creating publicity in order to artificially

and often temporarily inflate the share price of companies in which his clients have a financial interest. The Defamatory Manifesto also mimics Stafford's sensationalist writing style. The Plaintiffs further believe that Robert and Rudensky directly participated in the preparation and/or drafting of the Defamatory Manifesto, including (but not limited to) supplying Stafford with many of the false and defamatory allegations against the Plaintiffs, which Stafford then incorporated into the Defamatory Manifesto. However, the precise roles of the Defendants in crafting and disseminating the Defamatory Manifesto are known to them alone, and not yet known to the Plaintiffs;

- (d) The Defendants knew that the allegations in the Defamatory Manifesto were false and defamatory, and intended to make and widely distribute these false, defamatory and misleading allegations. They sought to imbue the Defamatory Manifesto with credibility by falsely calling it an "investigation". It was viewed by tens of thousands of people, and counting;
- (e) as part of the Defamatory Manifesto, the Defendants set up a "tipline" operated by Stafford to collect further false and defamatory allegations against the Plaintiffs;
- (f) the Defendants hired freelance web developers based in Bosnia and Herzegovina to register the websites on which they published the Defamatory Manifesto, to obscure the websites' origins and conceal the

Defendants' involvement in the publication, something that would only be part of a sophisticated plot;

- (g) after the Plaintiffs were forced to take steps to have websites publishing the Defamatory Manifesto taken down, the Defendants again re-published it on new websites, which were once again created in a manner to conceal the Defendants' involvement. A version of the Defamatory Manifesto remains available on the Internet;
- (h) the Defendants used alter-ego Twitter accounts, and/or hired or otherwise procured or involved additional conspirators, to further disseminate and publish links to the Defamatory Manifesto;
- (i) the Defendants, similarly concealing their identities through alter-egos, using fake email addresses and Twitter accounts and VPNs, and/or by hiring or otherwise procuring or involving additional conspirators for this purpose, publicized and provided links to the Defamatory Manifesto on various Internet message boards and chat rooms. These message boards and chat rooms related to the Canadian and U.S. securities markets and are frequented by investors;
- (j) the Defendants also used alter-ego Twitter accounts to publish further false, defamatory, harassing, and malicious Unlawful Statements against the Plaintiffs, including wishing harm to come to Kassam, and inciting or encouraging others to harm him;

- (k) the Defendants published further false, defamatory, harassing, and malicious Unlawful Statements against the Plaintiffs through targeted emails sent from an anonymized email address;
- (l) the Defendants generated an Excel spreadsheet titled “Journalists.xlsx” that was made up of a list of journalists, news editors and others in the business community to whom the Defamatory Manifesto would be sent, with the goal of maximizing its distribution (the file was created on September 30, 2020 and listed 2,854 names). In the metadata, James Stafford (who purports to be a “journalist” with access to such contacts) is indicated as the “author” of this spreadsheet. The Defendants sent the Defamatory Manifesto to the media in a concerted but unsuccessful attempt to use the media to further publicize the Unlawful Statements and lend them a false and unwarranted air of credibility;
- (m) from fall 2020 through at least spring 2021, the Defendants continued their coordinated defamation campaign by publishing false and defamatory Unlawful Statements in over 1,000 posts on the website Stockhouse. The Defendants took steps to conceal their identities and obscure the origin of these additional Stockhouse posts by using VPNs, and temporary email addresses;
- (n) on June 28, 2021, after the initial Statement of Claim in this matter was issued, the Defendants published a sequel to the Defamatory Manifesto on the website www.marketfrauds.to, titled “Moez Kassam & Anson Funds Part

II: Rotten to the Core” (the “**Second Defamatory Manifesto**”). The Defendants published several other false and defamatory posts about the Plaintiffs on this website, including audio recordings provided by Robert, demonstrating his involvement in the preparation and/or drafting of the Second Defamatory Manifesto, as described further below. The Second Defamatory Manifesto was released on June 28, 2021, days after critical commentary regarding Reconnaissance Energy Africa Ltd. (“**RECO**”), a stock that Stafford was hired to promote, as set out below, was published: *The Globe and Mail* published an article questioning the legitimacy of RECO on June 20, 2021. Viceroy Research, another forensic research firm, published analysis also questioning the quality of RECO assets and stock value on June 24, 2021. Stafford used the Plaintiffs as a scapegoat to distract attention from adverse developments involving companies in which he had an interest.

29. As a result of the Defendants’ conduct, the Unlawful Statements have been publicized broadly on the Internet, on various websites and online message boards, including Reddit and Stockhouse, and on Twitter. They have been disseminated widely, causing unwarranted adverse publicity for Anson that has significantly disrupted and damaged its business. In fact, as of the date of this Fresh as Amended Statement of Claim, the Secondary Defamatory Manifesto is on the “first page” of Google search results for Moez Kassam.

30. The Defendants have the means to attack the Plaintiffs through the Conspiracy and are motivated by an animus against Anson because of its scrutiny of overvalued

stocks and pump-and-dump schemes, some of which Stafford or the other Defendants stood to benefit from. Stafford is paid significant sums of money (millions of dollars) as a stock promoter and has been involved in several pump and dump schemes. In particular, the Plaintiffs believe that the Defendants have targeted them in their malicious and illicit Conspiracy because part of Anson's investment strategy involves scrutinizing overvalued companies, including, in the past, those in the cannabis industry, and including overvalued companies which Stafford promoted and/or invested in.

31. As was the case with other investment firms in 2018, one of Anson's investment strategies involved short-selling securities of several Canadian-operated publicly listed cannabis companies that it believed to be overvalued. Many investment firms, in the ordinary course of business, established short positions against Canadian cannabis companies whose stock prices they believed to be overvalued based on their business fundamentals. Some of these cannabis companies were referred to in the Unlawful Statements.

32. The Unlawful Statements falsely attribute to the Plaintiffs an almost preternatural power to choose securities where they can cause the share price of a company to decline. The Plaintiffs did not cause the share prices of the companies mentioned in the Unlawful Statements to decline. Market fundamentals – alongside overall waning investor sentiment and the actual performance of these companies, among other factors – did. In most cases, the valuations of such companies had at one point fallen 70% or more from their peak price.

33. The Defendant Rudensky has an animus against Anson and Kassam tracing back to at least December 2018, when an independent forensic financial research firm, Hindenburg Research, posted critical findings about Aphria Inc. ("**Aphria**"), a publicly traded cannabis start-up. During this period, Aphria's stock price fell over 40%. The critical research findings related to a key promoter of Aphria who is one of its founders, Andy DeFrancesco. DeFrancesco is the CEO of The Delavaco Group, a merchant bank of which Rudensky is a partner. Rudensky wrongfully blamed the Plaintiffs for Hindenberg's critical research findings regarding Aphria.

34. The Defendant Stafford has an animus against Anson and Kassam tracing back to at least mid-2020, including but not limited to in connection with the companies Facedrive Inc. ("**Facedrive**") and RECO. Stafford has a significant financial interest and exposure to Facedrive and RECO, which gave him an incentive to diminish and disparage critical commentary about those companies. As a result, Stafford publicly and wrongfully used the Plaintiffs as scapegoats to blame for Facedrive and RECO's share prices declining, and in particular he blamed the Plaintiffs for the critical research findings about Facedrive and RECO published by Hindenburg Research and Viceroy Research respectively. In fact, the share prices of overvalued companies like FaceDrive and RECO decline not because of the Plaintiffs' influence, but rather because of market fundamentals.

35. Stafford is a stock promoter and was hired, directly and/or indirectly, to promote, and artificially inflate the volume and/or price of, Facedrive shares using his website, www.OilPrice.com. The public disclosure on www.OilPrice.com stated in part that the purported articles about Facedrive "**should be viewed as a commercial advertisement**

only. We have not investigated the background of the featured company. Frequently companies profiled in our alerts experience a large increase in volume and share price during the course of investor awareness marketing, which often end as soon as the investor awareness marketing ceases” (emphasis added).

36. In total, Stafford directly and indirectly, at one point in time, owned up to approximately 1.5 million shares in Facedrive (worth roughly \$8 million at the time the agreement was press released by Facedrive), some of which he received as compensation for stock promotion, and some of which he purchased on the open market. As a result, Stafford had a significant incentive to inflate Facedrive’s share price.

37. These incentives gave Stafford the impetus to engage in the Conspiracy and spread Unlawful Statements about the Plaintiffs. Given Stafford’s financial interest in Facedrive, he has an incentive to undermine and disparage critical commentary about Facedrive, published by market participants or other observers, which questions its intrinsic value. On July 23, 2020, Hindenburg Research published research findings that were critical about Facedrive. That same night, the first Unlawful Statements about the Plaintiffs were published on Stockhouse.

38. Stafford was also hired to promote, and artificially inflate the volume and/or price of, RECO’s shares. Since January 2020, Stafford and/or his companies have published over twenty false and misleading articles promoting RECO on www.OilPrice.com. The disclosure on these articles indicates that Stafford was paid US\$280,000 for a series of four articles in January 2021. All of the articles consistently disclosed that Stafford and/or

his companies own shares in RECO and accordingly have a substantial incentive to see the share price perform well.

39. Stafford's financial interest in RECO once again motivated him to spread Unlawful Statements about the Plaintiffs as part of the Conspiracy. On June 20, 2021, *The Globe and Mail* published a critical article about RECO. On June 24, 2021, Viceroy Research, another forensic research firm, expanded on *The Globe and Mail's* reporting and posted further critical findings about RECO. The critical findings included allegations that RECO had engaged in stock promotion and had other fundamental issues. The Second Defamatory Manifesto was published on June 28, 2021, a few days after Viceroy Research released its first report regarding RECO.

40. For further information on Facedrive, RECO and Stafford's animus towards the Plaintiffs, see **Appendix "C"** at section B.

41. With respect to the Defendant Robert, he has an animus against Anson and Kassam, which is in part based on his claims that he has not been paid for due diligence that he shared with Anson. In October 2020, he aggressively attempted to obtain a significant and unwarranted amount of money from Anson, plus an indemnity and immunity, in exchange for certain due diligence he shared with Anson, and for information on the identity of the Unknown Defendants, which he confirmed he knew. Robert utilized the circumstances – the publication of the Defamatory Manifesto and other Unlawful Statements – to attempt to pressure Kassam and Anson to pay him significant amounts, giving his demands the air of extortion. While not all aspects of Robert's animus against Anson and Kassam are known to the Plaintiffs, the animus is consistent with past racist

tweets by Doxtator, and in light of the fact that Kassam, other senior employees at Anson, and their spouses are not Caucasian.

42. Though all of the parties behind the Conspiracy to damage the Plaintiffs' business and reputation are not known at this time, the damage wrought by their illegal conduct is clear.

D. THE DEFENDANTS' CONSPIRACY AGAINST THE PLAINTIFFS

(i) Beginning in late 2018, Robert develops animus towards Plaintiffs

43. Beginning in late 2018, Robert developed a malevolent animus towards the Plaintiffs, and in particular towards Sunny Puri ("**Puri**"), a Principal and Portfolio Manager at Anson. Indeed, as set out below, Robert's animosity towards Puri has included threatening violence.

44. Anson and Kassam first met Robert in late August 2018, when they discussed the prospect of him providing consulting services to Anson via the company he had founded, Harvest Moon Cannabis Company. Over a series of messages exchanged between Kassam, on behalf of Anson, and Robert, Anson and Robert agreed that Robert would provide Anson with due diligence, and that if Anson chose to trade on any due diligence provided by Robert, it would pay Robert 15% of any profits it made on the trade. Anson could and did independently decide, based on its own process, if it would trade any securities discussed with Robert.

45. In the months after August 2018, Robert shared limited due diligence with Anson regarding certain public companies, but Anson did not trade on any of that information at that time. Robert became irrationally angry with Anson, and with Puri in particular,

because Robert thought – incorrectly – that Anson had traded profitably on the limited due diligence he had provided and that Anson had shared this information with others. In November 2018, Robert told Allen Spektor (the person who introduced Robert to Anson) that he wanted Puri fired. On November 8, 2018, Robert wrote to Spektor via a messaging app that “I’m never moving on...And if I see sunny [sic] I might kick him in the teeth[.] Straight up[.] Your friend is a SHYSTER”.

46. In or around August 2019, Robert provided Anson with diligence concerning General Electric (the “**GE Diligence**”), which Anson did use in respect of a trade. Specifically, on or around August 15, 2019, Anson purchased approximately 5,000 put options in GE, which allow for the right to short sell the equivalent of 500,000 shares. Anson also sold short approximately 430,000 common shares of GE. Anson subsequently closed both positions. Kassam informed Robert about Anson’s trades in GE in real time in order to be completely transparent about how Anson was using the GE Diligence. In the aggregate, Anson’s GE trade yielded a profit of US\$121,073.70. Anson was prepared to pay Robert 15% of its profit, or US\$18,161.06, for the GE Diligence in accordance with its arrangement with Robert.

47. Despite this transparency, Robert refused to accept the amount he was owed for the GE Diligence because he falsely claimed, without any basis, that Anson had “made millions” using it. Instead, Robert began to threaten legal action, as well as physical violence and other retribution.

48. On August 21 and 22, 2019, Robert sent Kassam the following messages (emphasis added):

I'm working on a report

It's called the biggest predatory fund in Potstocks...

I'm going to talk to my lawyer also cause I'm sick [of] people like trying [to] fuck me over...

I'm going to talk to my lawyer sorry Moez sick of this...

So tomorrow I reveal your friendly bear

Just getting started

Reports ready to go...

You fucked over wrong person for last time Moez

Tweets pretty popular

Media already texting me for the story

49. In September 2019, while Puri was in a meeting at a professional conference at the Shangri-La Hotel in Toronto, Robert threatened to physically assault him in front of other conference attendees.

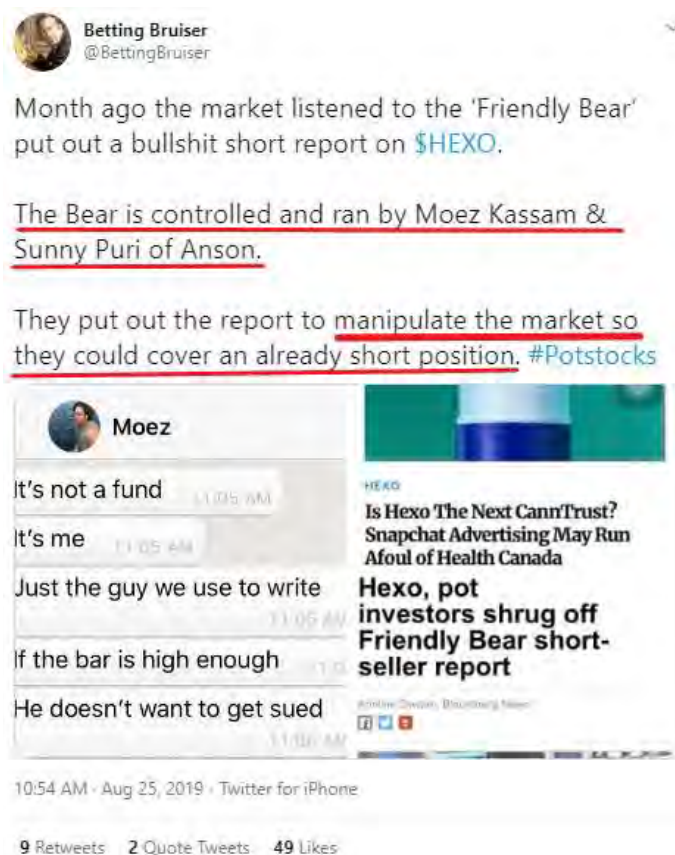
50. After August 2019, Anson never again worked with Robert.

(ii) In Summer 2019, Robert launches a Campaign to spread Unlawful Statements about the Plaintiffs

51. In late August 2019 – a few days after threatening to begin to publicly “reveal” purported content about Anson – Robert unleashed a series of tweets through his Betting Bruiser account making false and defamatory Unlawful Statements about the Plaintiffs. Just as Robert had threatened Kassam, “Betting Bruiser” tweeted false allegations that

Anson and Kassam had commissioned a report that the Friendly Bear, an independent research outfit, had published regarding Hexo Corp., a cannabis company. In particular:

- (a) on August 25, 2019, “Betting Bruiser” tweeted false allegations about Anson’s purported involvement in the Friendly Bear report. He falsely alleged that Anson “controls” the Friendly Bear – which allegations also appeared in the Defamatory Manifesto over a year later. He included in the tweet a screen shot of text messages from Kassam, which he presented out of context and in a misleading manner (emphasis added below):



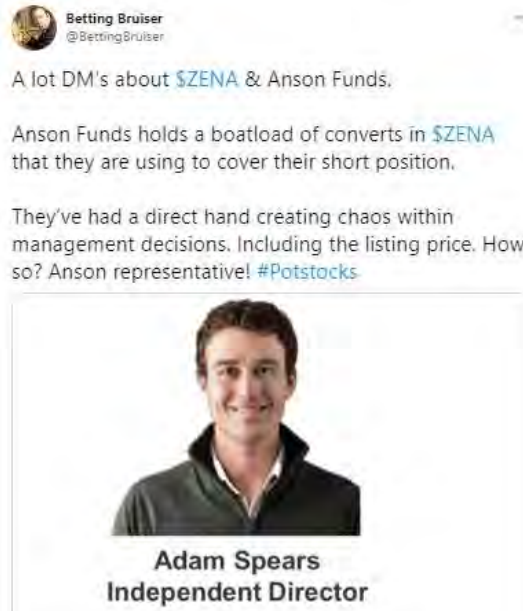
To be clear, neither Anson nor Kassam owns or controls (or owned or controlled at the time) the Friendly Bear. As described above, publication of

public company analysis is a routine feature of the capital markets. Anson and other market participants routinely share investment theses (based on publicly available information) with others in the industry for the purpose of stress testing such theses. To the extent individuals publish reports on public companies, these may or may not accord with the views of Anson and other investment firms. Anson does not “control” such analysts, who independently form their own views regarding companies and independently choose if and when to publish reports;

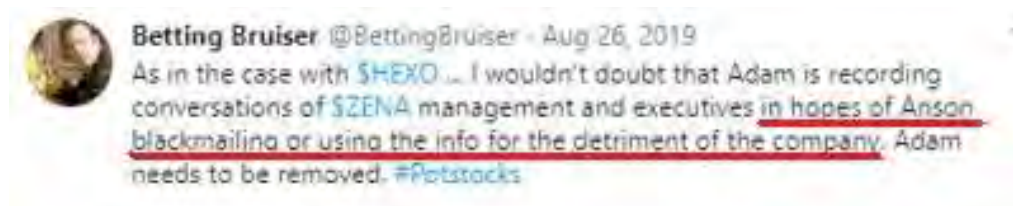
- (b) later the same day, he tweeted about his plan to “expose” Anson. This tweet falsely stated that Anson had connections to market manipulators, and that the Anson funds had “created” a “death spiral” in public companies in order to “cash out their short positions”:



- (c) on August 26, 2019, “Betting Bruiser” published several tweets falsely alleging that Anson used a representative, Adam Spears, on the Board of Directors of a cannabis company named Zenabis Inc. (“**Zenabis**” or “**\$ZENA**”) to intentionally and negatively influence the company’s business decisions and artificially reduce its share price:



- (d) later that same day, he tweeted false allegations that Spears was recording conversations among Zenabis management so that Anson could blackmail the company or use the information to its detriment (emphasis added below):



52. On March 11, 2020, "Betting Bruiser" tweeted a photo of Puri, commenting: "The biggest chicken hawk that I've ever met in my life. Every time I see him we have words. Sunny Puri from Anson Funds. If you've ever crossed paths with him then your stock is likely -95% from its high and he holds your [fate] in his hands via convertible debt. #PotStocks". This demonstrates the personal animus that Robert holds towards Puri.

(iii) In Summer 2020, the Conspiracy spreading Unlawful Statements about the Plaintiffs expands

53. In July and August 2020, the Defendants conspired to spread the publication of the Unlawful Statements on the Internet, including via posts published on the website Stockhouse. They published posts on Stockhouse on:

- (a) July 23 (the “**July 23 Stockhouse Post**”),
- (b) August 14 (the “**August 14 Stockhouse Post**”),
- (c) August 17 (the “**August 17 Stockhouse Post**”), and
- (d) August 28, 2020 (the “**August 28 Stockhouse Post**” and collectively, the “**Unlawful Stockhouse Statements**”).

54. The August 14, 17 and 28 Stockhouse Posts were published from Mexico.

55. The Defendants have also continued to publish further and additional Unlawful Statements on Stockhouse through at least spring 2021 (collectively, the “**Further Unlawful Stockhouse Statements**”). Many of the Unlawful Stockhouse Statements and Further Unlawful Stockhouse Statements were published using IP addresses originating in Mexico, predominantly Mexico City, the surrounding area, and the nearby city of Toluca. At least four employees of www.OilPrice.com are based in Mexico.

56. For example, as set out above, on July 23, 2020, Hindenburg Research published a critical report about Facedrive, a company whose stock Stafford was hired to promote.

57. Stafford and the other Defendants conspired to anonymously publish a post titled “The Real Story on Moez Kassam and Anson Funds – Part 1” on Stockhouse on July 23, 2020, under the pseudonym “JusinTime”:



58. The July 23 Stockhouse Post called Kassam a “criminal” and included statements accusing him of engaging in illegal, unethical, and “corrupt” business practices as well as egregious personal attacks, which were intended to damage his reputation and turn investors away from him. The accusations are false and defamatory.

59. The July 23 Stockhouse Post accused Kassam of being “corrupt and criminal” and asserted that his practices included “treading on people, lying and using every trick in the book to bring companies down that he bet against” (emphasis added below):

So here is the beginning part of the tale about the corrupt and criminal CIO at Anson funds?
A few short years ago Moez Kassam was a high flying star in the hedge fund space. He had \$1 billion under management (now down to \$250 million and falling) and was the praise of the financial community. But what people don't know is that his media praise was paid for (like when Toronto Life covered his wedding – paid for and made to look like an editorial - shame). But even worse he made his money the dirty way, treading on people, lying and using every trick in the book to bring companies down that he bet against. Whatever it took, whoever he ruined financially or reputation wise he would do it to turn a profit.

60. For more detail on the July 23 Stockhouse Post and information regarding the Unlawful Stockhouse Statements that followed, see **Appendix “D”**.

61. Other posts containing Unlawful Statements against the Plaintiffs, in addition to those described in **Appendix “D”**, were published on Stockhouse throughout July and

August 2020 via Mexican IP addresses. Stockhouse users located in Mexico City and surrounding areas were some of the most active and frequent posters of Unlawful Statements on Stockhouse. Later, as set out further below, a Stockhouse account named “ToffRaffles”, which is controlled by Stafford, published several Unlawful Statements on Stockhouse via a Mexican IP address associated with Mexico City.

62. Following communications with Stockhouse and in light of its website terms and conditions of use, which prohibit unlawful or defamatory content, the Plaintiffs were able to have the Unlawful Stockhouse Statements removed from the Stockhouse website.

63. Almost immediately after the removal of the Unlawful Stockhouse Statements, the Defendants conspired to curate a lengthier publication adding to the false and defamatory statements they previously published via the Unlawful Stockhouse Statements. Then they took to other means to broadly disseminate the Unlawful Statements as part of their concerted and coordinated effort to defame the Plaintiffs.

64. On September 10, 2020, “John Murphy” tweeted that Anson and Kassam were engaged in unlawful market manipulation, and that regulators should scrutinize Anson and Kassam, tagging the Twitter accounts of Robert (“Betting Bruiser”); Jeff Kehoe, head of enforcement of the OSC; and Daniel Dale, a reporter with CNN who formerly reported for The Toronto Star:

these reverse pump and dumps must be watched more closely by the regulators. moez and his band fund these trades every week @ClarityToast finds the next fraud that he is paid to profile. @BettingBruiser @ddale8 @JeffKehoeOSC \$apha \$fd \$gfl \$nkla

65. A few days later, on September 12, 2020, “John Murphy” tweeted (emphasis added):

anson is a very corrupt cad fund naked [sic] shorting many small cap co's and when they get in trouble / want to cover ***they pay groups like @HindenburgRes to say the co is a fraud and going to zero.*** how many zeros have they called, the bottom is normally around when the piece comes out

66. In or around summer or early fall 2020, Stafford, Rudensky and/or Robert met or spoke and agreed to concoct defamatory allegations against the Plaintiffs and coordinate the content of the Defamatory Manifesto. They were motivated by their respective animus against the Plaintiffs, as described herein. Stafford was aware of Robert's animus against the Plaintiffs because he had publicly documented it via Twitter. Stafford and Rudensky had previously met given that Rudensky's employer, the Delavaco Group, worked with Stafford on several occasions to promote stocks through www.OilPrice.com.

67. Stafford, Rudensky and/or Robert met or spoke on at least four occasions to plan the Defamatory Manifesto. At those meetings, some of which were recorded and/or transcribed, Stafford solicited Robert and Rudensky for material to include in the Defamatory Manifesto. Robert and Rudensky – purportedly acting as “sources” for Stafford as a “journalist” – made false and defamatory allegations against the Plaintiffs that they knew and intended that Stafford or others would use in the Defamatory Manifesto. Stafford, Robert and Rudensky planned to publish the Defamatory Manifesto anonymously because they knew the allegations it contained were defamatory. When Robert later spoke to Kassam about the Defamatory Manifesto, he falsely told Kassam that, although he knew about the Defamatory Manifesto, he was not involved in its drafting

or publication, and instead blamed only Stafford and Rudensky (as described in paragraphs 98-99 below).

68. Excerpts from transcripts of meetings and/or conversations between Stafford, Rudensky and/or Robert to plan the Defamatory Manifesto are included in **Appendix “E”** at section A. As set out in **Appendix “E”** at section A, the excerpts from the transcripts establish that: Rudensky was involved in preparing the Defamatory Manifesto; Stafford and Robert discussed drafting the Defamatory Manifesto, with Stafford asking Robert to draft false and defamatory allegations against the Plaintiffs; Stafford, Rudensky and Robert intended to harm the Plaintiffs by targeting their relationships with brokers and regulators; Stafford was paid to promote Facedrive; Stafford and Robert discussed Rudensky's employer, Andy DeFrancesco; and Robert was involved in critical research findings published about public companies, including Aphria.

69. Stafford, Rudensky, Robert, Jacob and the other Unknown Defendants then wrote or contributed to the Defamatory Manifesto – using the material provided by Robert and Rudensky as well as material from other Defendants and other sources – and/or published, disseminated or publicized the Defamatory Manifesto, as set out below.

70. On or around September 27, 2020, the Defamatory Manifesto – a 20-page screed titled “Moez Kassam and Anson Funds: A Tale of Corruption, Greed and Failure” – appeared on the website www.MoezKassam.com. It was published anonymously under the pseudonym “The Match Man”.

71. www.MoezKassam.com is a website created or established by the Defendants for the principal purpose of publishing the Defamatory Manifesto in furtherance of the conspiracy.

72. In the weeks after the Defamatory Manifesto was published, Anson received two anonymous telephone calls at its offices threatening harm to Anson and physical harm to Kassam personally.

(iv) The Defamatory Manifesto expands on previously published false statements and falsely states and implies that the Plaintiffs' behaviour was illegal, unethical, and/or in violation of securities laws

73. The Defamatory Manifesto contains many serious and inflammatory allegations regarding the Plaintiffs that are entirely false and that the Defendants knew or ought to have known were false. It repeats and expands on the baseless claims made in Robert's August 2019 tweets and the Unlawful Stockhouse Statements. It falsely and maliciously accuses Anson, Kassam, and other Anson personnel, including Puri, of dishonest and illegal activities that included the following: short-selling schemes, which the Defamatory Manifesto alleges were illegal, even though short selling is a legal trading strategy; insider trading; fraud; and other breaches of securities laws and regulatory rules and policies, among other things.

74. Although the Defamatory Manifesto was published anonymously, it references many precise topics that the Doxtators had previously tweeted false claims about. Robert provided this material to Stafford in their meetings to plan the Defamatory Manifesto.

75. By way of example, from its first paragraph, the Defamatory Manifesto accuses the Plaintiffs of engaging in criminal and unethical conduct (emphasis added):

Never has there been a bigger scourge of the Canadian capital markets. Moez Kassam and his Anson Funds have systematically engaged in capital market crimes, including insider trading and fraud, to rob North American shareholders of countless millions. In his attempt to destroy small-cap Canadian companies through nefarious means, a string of feeder funds and untraceable payments to elude regulators, Moez Kassam has betrayed even his closest friends. Now, the other shoe is about to drop as Kassam's funds run out and a string of failed attempts at illegal destruction leave this naked short seller truly naked.

76. The Defamatory Manifesto labels Kassam the “Toad of Bay Street”, with a large photograph of a toad, and advises readers to “steer clear” from Kassam’s ***“illegal activities.”***

77. A detailed summary of the entire Defamatory Manifesto can be found in **Appendix “E”** at section B.

78. The Defamatory Manifesto encourages readers to share and re-publish it. It also solicits readers to provide additional defamatory material regarding Anson and Kassam for future posts, including by use of the email “hotline” accounts, such as info@moezkassam.com.

79. The earliest published version of the Defamatory Manifesto purported to be a standalone document. The Defamatory Manifesto was later amended to allege that it was the first of a three-part series (similar to the “Part 1” concept used in the title of the July 23 Stockhouse Post). “Part 2”, the Second Defamatory Manifesto, has been published, as set out below. To Anson’s knowledge, the third part has not yet been published. If it is, and it contains false, malicious and defamatory content similar to the Unlawful Statements

already contained in the Defamatory Manifesto and the Second Defamatory Manifesto, it will cause further, irreparable damage to the Plaintiffs' business and reputations.

(v) *The Defendants procured at least eight internet domains to facilitate widespread publication of their Defamatory Manifesto*

80. Following communications with the third party host of the www.MoezKassam.com domain, the Plaintiffs were able to have Defamatory Manifesto removed from that website.

81. Since that time, the Defendants acquired multiple Internet domain names to republish the Defamatory Manifesto online. To date, the websites acquired and used by the Defendants to publish the Defamatory Manifesto include the following:

- (a) www.MoezKassam.com;
- (b) www.StockManipulators.com;
- (c) www.CapitalMarketCrimes.com;
- (d) www.StockManipulators.org;
- (e) www.CapitalMarketCrimes.org;
- (f) www.MarketCrimes.ws;
- (g) www.MarketCrimes.to;
- (h) www.CapitalMarketCrimes.to; and
- (i) www.MarketFrauds.to.

82. Whenever the Plaintiffs have taken steps to have a website containing the Defamatory Manifesto taken down, the Defendants have republished the Defamatory

Manifesto on a new website, forcing the Plaintiffs to seek to have that new post of the Defamatory Manifesto taken down. Each time the Defamatory Manifesto is republished online, it increases the harm and damage to the Plaintiffs. The Plaintiffs' claim against the Defendants is in relation to all versions of the Defamatory Manifesto that any of the Defendants published on the Internet, regardless of any differences between published versions of the Defamatory Manifesto.

83. The Defendants did not acquire the domain names directly. Rather, in order to cover their tracks and frustrate the Plaintiffs' efforts to determine who was behind the Defamatory Manifesto, the Defendants hired freelance web developers based in Sarajevo, Bosnia and Herzegovina, and potentially other developers based in other jurisdictions, to create the websites and register the websites on their behalf. This was a sophisticated attempt to obfuscate who was behind the Defamatory Manifesto and shield members of the Conspiracy from liability for their misconduct.

84. The Defendants or their proxies communicated with the Bosnian developers using anonymous email addresses to conceal their identities, including from the developers themselves. The email addresses used by the Defendants were editormarketinvestigations@protonmail.ch and anesalic@protonmail.com. "Anes Alic", the name used in one of these email addresses, is a "journalist" for Stafford's website www.OilPrice.com (as shown below), and the emails sent by anesalic@protonmail.com to the developers were sent either by Stafford or at his behest:



85. Stafford and the other Defendants compiled a spreadsheet containing the names and email addresses of 2,854 journalists, news editors, and others in the business community to whom they planned to disseminate the Defamatory Manifesto. Stafford had many of these names and contact information in his purported capacity as a “journalist”. He and the other Defendants – seeking to imbue the Defamatory Manifesto with a false sense of credibility – intended that these journalists and news editors would re-publish the allegations against the Plaintiffs in their respective news outlets. The spreadsheet’s metadata (pictured below) indicates that the spreadsheet’s author was “James Stafford”, and that the spreadsheet was created on September 30, 2020 and last edited October 1,

2020 — just days after the Defamatory Manifesto was first published. Further details of the Defendants’ actions in regard to anonymously hiring the Bosnian web developers, and anonymously disseminating the Defamatory Manifesto, can be found in **Appendix “E”** at section C.



86. Stafford and/or the other Defendants, using the email address “anesalic@protonmail.com”, sent this spreadsheet to the developers hired to assist with disseminating the Defamatory Manifesto:



Sent from ProtonMail mobile

----- Original Message -----

On 4. okt 2020. 23:17, anesalic <anesalic@protonmail.com> wrote:

Sent with ProtonMail Secure Email.

----- Original Message -----

On Sunday, October 4, 2020 10:44 AM, editormarketinvestigations <editormarketinvestigations@protonmail.ch> wrote:

Sent with ProtonMail Secure Email.

87. Despite Anson's requests, the current web host of the Defamatory Manifesto on www.MarketFrauds.to has refused to remove it. This website remains accessible on the Internet as of the date of this Amended Statement of Claim.

88. The Plaintiffs expended considerable resources in response to the Defendants' online attack, including but not limited to hiring investigators in North America and overseas, and contacting web registrars, hosts, message boards to mitigate the harm.

89. After the Plaintiffs worked with website registrars to have the Defamatory Manifesto removed from the websites described in paragraphs 81(a) through 81(i), the Defendants falsely alleged that Anson had undertaken a "Distributed Denial-of-Service" or "DDoS" attack – a type of illegal cyber attack – in order to have the Defamatory Manifesto removed, further defaming Anson. This is false: the websites were voluntarily taken down by the website hosts or registrars after Anson and/or its legal advisors advised

that the content was false and defamatory and in breach of these hosts/registrar's policies.

(vi) *The Defendants conspire to lead widespread dissemination of the Defamatory Manifesto*

90. **On the day the Defamatory Manifesto was initially published**, September 27, 2020, “John Murphy” tweeted the first link to the Defamatory Manifesto on www.MoezKassam.com – again demonstrating the involvement of the Doxtators in the Defamatory Manifesto and its proliferation. He included in his tweet the Twitter accounts of *The Globe and Mail* newspaper and BNN Bloomberg, with the aim of drawing the Unlawful Statements in the Defamatory Manifesto to their attention. From that initial tweet, the Defamatory Manifesto was reposted, shared and publicized widely around the Internet, including through social media.

91. On the same day, the Defendants anonymously sent an unsolicited email containing a link to the Defamatory Manifesto to a reporter at *The Globe and Mail* in an attempt to have the Unlawful Statements further publicized in the media. The Defendants used the email address “capitalmarketsinvestigation@protonmail.com”. To further defame the Plaintiffs and in furtherance of the Conspiracy, the Defendants anonymously sent links to the Defamatory Manifesto to other journalists, news editors, and others in the business community as well.

92. The Defendants also anonymously sent unsolicited emails containing a link to the Defamatory Manifesto (along with the false and defamatory content set out below) to individuals in the financial industry (the “**Unsolicited Emails**”). One version of the Unsolicited Emails was sent from the address “info@stockmanipulators.org” with the

subject line “Hedge Fund Scandal in Canada and the U.S.: Moez Kassam and Anson Funds accused of Stealing Billions.” Another version of the Unsolicited Emails had the title “Urgent News Tip – Huge Hedge Fund Fraud in America and Canada’s Stock Markets”. These Unsolicited Emails were designed and intended to further harm the Plaintiffs and damage their reputation in the financial industry.

93. On September 28, 2020 – the day after the Defamatory Manifesto was first published – Robert texted Spektor (the contact who introduced him to Anson) the following in reference to the Defamatory Manifesto (emphasis added):

I knew it was coming...

I know who wrote...

Moez likely going [to] sue

94. On September 29, 2020, “Betting Bruiser” tweeted a link to the Defamatory Manifesto, supporting the content of the post as follows:



95. Further examples of the Unsolicited Emails sharing the Defamatory Manifesto and the Defendants' concerted effort to disseminate the Defamatory Manifesto and publish it on Twitter can be found in **Appendix "E"** at sections D and E.

(vii) Shortly after its publication, Robert attempts to leverage the Defamatory Manifesto to extract money from the Plaintiffs and magnify his attacks

96. In early October 2020, Kassam approached Robert for information about who was behind the Defamatory Manifesto. In those conversations, Robert sought \$75,000 from Anson in relation to the due diligence he had provided, referenced in his September 30 tweet, and aggressively suggested that far more would be needed for information regarding the Unknown Defendants. He also sought blanket immunity, indemnification and a release from Anson before he would provide assistance, clearly attempting to use purported leverage against Kassam and Anson. In particular, Robert alleged that the Unknown Defendants had promised to pay him \$250,000 to assist them, insinuating that a similar or greater amount would be needed from Anson in order for Robert to forego assisting the conspirators and/or to provide assistance to Anson.

97. In a Whatsapp chat on October 1, 2020, Robert, using the username "Betting Bruiser", sent Kassam the following messages (emphasis added):

I sent invoice for what I think you owe me ... if you don't pay it

I can make 250k going to the other side

And that's not owed to me ... ***that's just to help bury you. Choice is yours.***

[...]

Again ... I sent invoice for \$75k [which] I think is fair for what you owe me ... I wanna sign indemnification... then we go from there. I'll try my best to get you what you need. That's all.

98. In their Whatsapp chat on October 1, 2020, Robert also told Kassam that Stafford had procured the drafting of the Defamatory Manifesto and was paying individuals for their involvement, including Rudensky. Robert also stated that Stafford was involved in running the “hotline” or tipline to which readers of the Defamatory Manifesto could send information. Robert texted Kassam the following:

[Attachment]

That's what Stafford sent me today

That's the general game plan for part 2 [of the Defamatory Manifesto]

Rudensky for sure wrote part 1 ... Stafford was paying him to do it ... he tried to get me to talk to him ... I assume he's one running the hotline

99. By telling Kassam that Stafford “tried to get me to talk to him” for the Defamatory Manifesto, Robert falsely implied that he was not a source of the defamatory allegations, which he was. He placed blame solely on Rudensky and Stafford.

100. On October 9, 2020, Kassam informed Robert via Whatsapp chat that Anson would no longer negotiate with him given his involvement in the Conspiracy. Anson was not prepared to provide Robert with payments or a release/indemnity. In response, Robert told Kassam that he had recorded a telephone conversation between them.

101. Shortly after the message exchange on October 9, “Betting Bruiser” published a series of tweets making false, defamatory, malicious and harassing allegations against

Anson, Kassam and other individuals associated with Anson. Among other things, these tweets were in retaliation for Anson and Kassam refusing to accede to Robert's aggressive demands. "Betting Bruiser" also threatened to release the recordings that Robert purportedly made of his private conversations with Kassam. These tweets included "Betting Bruiser" wishing death on Kassam on October 9, 2020 – the Friday before Thanksgiving weekend:



102. Further examples of these tweets can be found in **Appendix "E"** at section F.

(viii) The Defamatory Manifesto was disseminated widely online in fall 2020 and beyond

103. The Defendants have discussed, shared and published links to the Defamatory Manifesto, and/or hired others to discuss, share and publish links to the Defamatory Manifesto on their behalf, on several other websites and Internet message boards, including but not limited to Reddit, Stockhouse, Yahoo Finance and on social media. The Defendants or their proxies shared the Defamatory Manifesto in these industry forums using anonymous accounts, many of which were created using VPNs and "burner" email accounts, for the purpose of concealing the Defendants' identities. The Defendants also made further Unlawful Statements against the Plaintiffs while publicizing links to the

Defamatory Manifesto on these specialized message boards – all designed to cause the Plaintiffs maximum harm.

104. The messages publicizing the Defamatory Manifesto on blogs or chat forums often used similar or the exact same wording as one another (but were published by different usernames), reflecting the Defendants’ sophisticated and coordinated effort to anonymously disseminate the Defamatory Manifesto as widely as possible to maximize the damage caused to the Plaintiffs. Examples of messages publicizing the Defamatory Manifesto can be found in **Appendix “E”** at section G.

105. The Defendants published the Further Unlawful Stockhouse Statements – a litany of posts on Stockhouse from September 2020 and onwards – to disseminate the Defamatory Manifesto and other Unlawful Statements against the Plaintiffs. In total, over 1,000 such posts appeared on Stockhouse after September 27, 2020 (and the number of posts continues to increase as the Defendants perpetuate the Conspiracy). Many of the Further Unlawful Stockhouse Statements were published using single-purpose Stockhouse accounts, created and used predominantly or exclusively for the purpose of disseminating Unlawful Statements. To register these accounts, the Defendants often used email addresses created using www.SharkLasers.com, a website that provides temporary and untraceable email addresses. The Defendants also used VPNs to publish these Stockhouse posts. All of this covert behaviour was for the purpose of concealing the Defendants’ identities and obscuring the scope of the Conspiracy. Further details on the Further Unlawful Stockhouse Statements can be found in **Appendix “E”** at section G.

106. Between November 2020 and March 2021, Stafford also personally published Unlawful Statements on Stockhouse using the username “ToffRaffles”, a Stockhouse account registered to james@floatingmix.com, an email address Stafford owned and uses (the “**Stafford Unlawful Stockhouse Statements**”). The Stafford Unlawful Stockhouse Statements were published in a series of Stockhouse posts via a Mexican IP address. Stafford’s website, www.OilPrice.com, has offices and/or employees in or around Mexico City. Many of the Stafford Unlawful Stockhouse Statements referred to Facedrive, one of the companies that Stafford was hired to promote and of which he owned a significant number of shares. The Stafford Unlawful Stockhouse Statements can be found in **Appendix “E”** at section H.

107. The Defendants continued to publish Further Unlawful Stockhouse Statements in March and April 2021 and beyond. Many of these were published using the “Tor” browser (which conceals a user’s Internet activity) and Stockhouse accounts registered to temporary email addresses. Since March 2021, Stockhouse accounts using the Tor browser have published nearly 600 defamatory posts about the Plaintiffs, showing the continuing effort to defame the Plaintiffs and the sophistication of the Conspiracy. Further Unlawful Stockhouse Statements published in spring 2021 had headline tags including the following:

- (a) “How Embarrassing: Another Scandal For This Hedge Fund?”;
- (b) “Looks Like These Guys Are In Trouble Again”;
- (c) “Notorious Short Selling Fund In Trouble”;

- (d) “Sunny Puri wants to know the truth – here it is Sunny Puri”;
- (e) “Canadian Hedge Fund under SEC Investigation”;
- (f) “Anson Funds under SEC Investigation – Do Unitholders know”; and
- (g) “100K Reward for info leading to conviction of Anson Funds”.

(ix) *The Second Defamatory Manifesto and other defamatory articles*

108. On or around June 28, 2021, Stafford, Robert, Jacob and the other Unknown Defendants published the Second Defamatory Manifesto, titled “Moez Kassam & Anson Funds Part II: Rotten To The Core”, on the website www.marketfrauds.to. The Second Defamatory Manifesto continued the malicious attack against the Plaintiffs contained in the Defamatory Manifesto and the other Unlawful Statements, using many of the same themes. By way of example, the Second Defamatory Manifesto:

- (a) falsely alleged that the Plaintiffs were being investigated by the OSC and SEC and solicited readers to send “tips” to regulators;
- (b) claimed that Anson’s “bumper year in 2020” was due to its “destroying a fair number of companies and causing thousands of regular shareholders to lose their savings”;
- (c) called Kassam “a naked short seller whose activities are criminal and whose modus operandi is to manipulate the market and infiltrate companies to destroy them from the inside, while violating all short selling laws. He deliberately goes out of his way to ensure that companies fail”;

- (d) alleged that the Plaintiffs and *The Globe and Mail* conspired so that the newspaper “publish[es] a hit piece” on companies in which Anson has a short position; and
- (e) falsely claimed that the Plaintiffs commissioned and paid for critical media articles and critical analysis from industry analysts regarding, among other things, RECO (Reconnaissance Energy Africa Ltd.) and Facedrive.

109. As set out in **Appendix “C”**, Stafford was hired to promote and increase RECO’s stock price. *The Globe and Mail* published an article questioning the stock promotion activities and public disclosure of RECO on June 20, 2021. Viceroy Research, another investment firm, published analysis also questioning the quality of RECO assets and stock value on June 24, 2021. The Second Defamatory Manifesto was released on June 28, 2021, days after *The Globe and Mail* reporting and Viceroy Research analysis. As set out above, it is in the normal course that market participants and media look at facts and objective sources to analyse and report on different companies. Where those companies turn out to be grossly overvalued, market participants and media may publish their findings in that regard. This is part of properly functioning capital markets.

110. The Second Defamatory Manifesto included snippets of audio recordings of conversations Kassam had with Robert several years ago, which only included one side of the conversation when Kassam was speaking. Robert took these recordings without Kassam’s consent and gave them to Stafford and/or the other Defendants. The recordings were presented in the Second Defamatory Manifesto without context and in a

deliberately misleading manner in order to promote the defamatory meanings pleaded above.

111. The Second Defamatory Manifesto made numerous other defamatory allegations against the Plaintiffs, including that they manipulated stocks through social media, engaged in bribery and insider trading, commissioned DDOS attacks, filed false financial reporting, and “utilize Water boarding style trading tactics”. The Second Defamatory Manifesto accused Anson of “attacking” several companies, including Zoom, Facedrive, GSX Techedu, Genius Brands International, Gamestop, Valorem Resources, Starr Peak Mining, Whole Earth Brands, United Lithium, Mountain Valley MD Holdings, SOL Global, Clean Power Capital Corp, Red White & Bloom, Moderna, Medivolve, AMM Power, Value Line, Champignon Brands, “and many others.”

112. Several other defamatory posts were published on www.marketfrauds.to in addition to the Second Defamatory Manifesto (the “**Additional Unlawful Posts**”), including posts with the following titles:

- (a) “Moez Kassam has moved over \$20 million into offshore accounts in UAE and Dubai”, on May 15 and reposted on May 19, 2021.
- (b) “Reconnaissance Energy Africa is Anson Funds next target – Illegal tactics being employed by Anson”, on May 23, 2021;
- (c) “Anson Funds short and distort campaign against Recon Africa (and Globe & Mail corruption)”, on May 31, 2021;

- (d) “Corruption at Globe and Mail – Mail sent to their staff and regulators”, on June 18, 2021; and
- (e) “Hurt by Anson Funds – the SEC wants to hear from you ASAP”, on July 21, 2021.

E. THE DEFENDANTS ARE LIABLE

113. The Defendants are liable to the Plaintiffs for conspiracy, publicity that inaccurately places the plaintiff in a false light, intentional interference with economic relations, misappropriation of personality, internet harassment, and defamation.

(i) The Defendants’ Tortious Conspiracy Against Anson

114. Robert, Jacob and the Unknown Defendants conspired with one another to make and publicize the Unlawful Statements against the Plaintiffs. They formed an agreement with one another to injure the Plaintiffs, and in making the Unlawful Statements, their predominant purpose was to injure the Plaintiffs – namely, by damaging their business and reputation.

115. Moreover, the Defendants carried out the conspiracy by the unlawful means of defamation and other tortious misconduct pleaded herein.

116. The Defendants knew, or should have known, that the Unlawful Statements about the Plaintiffs and the publicity attached to them would be extremely harmful to the Plaintiffs, damaging their reputation and business.

117. The Defendants acted in furtherance of the Conspiracy by making, assisting with, participating in, and/or publicizing the Unlawful Statements, causing damage to the Plaintiffs.

(ii) False light

118. In addition, the Defendants are liable for placing Anson and Kassam in a false light.

119. By making, assisting with, participating in and/or publicizing the Unlawful Statements, the Defendants gave publicity to very serious false allegations against Anson and Kassam that placed them in a false light. The Defendants have publicly, falsely accused Anson and Kassam of serious crimes – including fraud, insider trading and other significant breaches of applicable securities laws and regulations, as well as cyber crimes. These allegations would be highly offensive to a reasonable person.

120. In making, assisting with, participating in and/or publicizing the Unlawful Statements, the Defendants knew or recklessly disregarded the falsity of the Unlawful Statements against Anson and Kassam and the false light in which they would thereby be placed.

(iii) Intentional interference with economic relations

121. By making, assisting with, contributing to and/or publicizing the Unlawful Statements, including through the Unlawful Stockhouse Statements, the Further Unlawful Stockhouse Statements, the Defamatory Manifesto, the Second Defamatory Manifesto, and the Additional Unlawful Posts, Robert and Jacob's Twitter accounts, and other websites, the Defendants are liable for intentional interference with Anson's economic relations.

122. The Defendants, with the intention of harming Anson's business and damaging its reputation, made a series of false, malicious, defamatory and unlawful public statements about Anson's principal, Kassam, as well as other Anson personnel, including Puri and Anson's General Counsel, Laura Salvatori. The Unlawful Statements falsely accused Kassam, and by extension Anson, of unlawful, dishonest and criminal conduct. The Unlawful Statements were published to countless market participants, including current and potential Anson investors. As a result of the Unlawful Statements, these third parties were deceived about the subject matter of the Unlawful Statements. The purpose and result of the Defendants' deceit was to harm Anson and Kassam.

(iv) Appropriation of personality

123. The Defendants are liable for wrongfully appropriating Kassam's personality by purchasing the domain name "www.MoezKassam.com" and using it to publicize the Unlawful Statements regarding Anson and Kassam. The Defendants also acquired the email address "info@moezkassam.com" in furtherance of the Conspiracy.

124. By using the domain name in this manner, they violated Kassam's exclusive right to use his own identity, particularly his name, causing damage.

(v) Internet harassment

125. The Defendants are liable for internet harassment of the Plaintiffs by writing, publishing, disseminating, and publicizing all of the Unlawful Statements – including the Unlawful Stockhouse Statements, the Further Unlawful Stockhouse Statements, the Unsolicited Emails, the Defamatory Manifesto, the Second Defamatory Manifesto, the Additional Unlawful Posts, and countless communications via social media. The

Defendants' defamation campaign against the Plaintiffs has lasted over a year to date and is ongoing, with no end in sight. They have publicized the Unlawful Statements in a wide range of Internet forums with the intent of maximizing the spread of their false and defamatory allegations.

126. In writing, publishing, disseminating and publicizing the Unlawful Statements, the Defendants maliciously or recklessly engaged in outrageous, extreme conduct that is beyond all possible bounds of decency or tolerance, causing the Plaintiffs damage. The Defendants intended to impugn the Plaintiffs' dignity and cause fear, anxiety or emotional upset in the Plaintiffs.

(vi) Defamation

127. Finally, the Defendants are liable for defamation for the false and highly defamatory statements made in the Unlawful Statements, including the Unlawful Stockhouse Statements, the Further Unlawful Stockhouse Statements, the Unsolicited Emails, and, ultimately, the Defamatory Manifesto (which was published multiple times, using various domain names), the Second Defamatory Manifesto, the Stafford Unlawful Stockhouse Statements and the Additional Unlawful Posts. The Doxtators are further liable for the false and defamatory statements they published about the Plaintiffs on Twitter.

The Unlawful Stockhouse Statements are Defamatory

128. The Unlawful Stockhouse Statements (discussed above at paragraphs 53 to 60 and in **Appendix "D"**) in their entirety, in their natural and ordinary meaning, including their express and implied meaning in their full context, and/or by innuendo, are false and

defamatory of the Plaintiffs. In addition to the natural and ordinary meanings of the Unlawful Statements contained in the Unlawful Stockhouse Statements, and without limiting the generality of the foregoing, the Unlawful Stockhouse Statements would lead a reasonable reader to conclude, or would mean or would be understood to mean, the following regarding Anson and its principals:

- (a) they are corrupt, dishonest, deceptive, duplicitous and cannot be trusted;
- (b) they destroy and/or devalue companies and their shareholders through nefarious means in order to benefit financially;
- (c) they get in over their heads and are unable to control their investments/trading strategies, and/or are inept, incompetent and reckless in their investment/trading practices;
- (d) they engage in unlawful and illegal activities, including market manipulation, abusive trading practices, and securities law and/or criminal law violations;
- (e) they published or participated in the creation of false research reports for the purpose of manipulating the market; and
- (f) they ought to be investigated, including by regulators.

129. In addition to the meanings set out in paragraph 128, and in addition to its plain and ordinary meaning, the July 23 Stockhouse Post would lead a reasonable reader to conclude, or would mean or would be understood to mean, the following regarding Anson and its principals:

- (a) they are criminals;
- (b) they bribe and/or induce regulators through other means to ignore their unlawful and/or illegal activities;
- (c) they do not exercise proper judgment and they make poor business decisions;
- (d) they cannot be trusted with investors' funds;
- (e) they have not legitimately earned their success and goodwill;
- (f) the Anson Funds lost millions of dollars due to their reckless conduct; and
- (g) they were humiliated and desperate as a result of the losses they incurred.

130. In addition to the meanings set out in paragraph 128, and in addition to its plain and ordinary meaning, the August 14 Stockhouse Post would lead a reasonable reader to conclude, or would mean or would be understood to mean, the following regarding Anson and its principals:

- (a) they caused Anson Funds to lose hundreds of millions of dollars due to their reckless conduct or ineptitude;
- (b) they were humiliated and desperate as a result of their business losses;
- (c) they ought to be avoided, as associating with them will result in harm;
- (d) they encourage or induce others to become corrupt;

- (e) they caused or contributed to the publication of misleading, false, and/or fraudulent information regarding a legitimate company;
- (f) they will be investigated and punished by regulators; and
- (g) with respect to Kassam, in particular, that he is unscrupulous, immoral and unethical.

131. In addition to the meanings set out in paragraph 128, and in addition to its plain and ordinary meaning, the August 17 Stockhouse Post would lead a reasonable reader to conclude, or would mean or would be understood to mean, the following regarding Anson and its principals:

- (a) they have significantly harmed the capital markets through their unethical, unlawful, duplicitous and/or illegal conduct;
- (b) they engaged in malicious, unlawful, and targeted attacks and/or trading and other conduct to harm Aphria and its shareholders in order to increase their own wealth;
- (c) they engage in predatory, opportunistic, dishonest and unethical conduct for financial gain;
- (d) they corrupt and/or induce others to engage in or assist in improper conduct;
- (e) they unlawfully and/or improperly obtained and misused confidential/insider/material non-public information;

- (f) they provided false, fraudulent, or misleading information about Aphria for publication and dissemination to harm Aphria, and for their own gain;
- (g) they profit off the hardship and damage they cause to others;
- (h) they will be investigated and punished; and
- (i) with respect to Kassam in particular, that:
 - i. he is two-faced, a fake and a fraud; and
 - ii. he is amoral, lacks a conscience, and engages in reprehensible and antisocial conduct.

132. In addition to the meanings set out in paragraph 128, and in addition to its plain and ordinary meaning, the August 28 Stockhouse Post would lead a reasonable reader to conclude, or would mean or would be understood to mean, the following regarding Anson and its principals:

- (a) they used illegal, unethical, and/or nefarious means to destroy and/or devalue the Canadian company, Zenabis, for financial gain;
- (b) they covertly or otherwise inserted a “stooge” to influence Zenabis’ decisions and/or cause the company to act against its own interests for Anson’s gain;
- (c) they exploit, induce and/or corrupt others to engage in dishonest, illegal, unlawful, and/or unethical activities on their behalf;

- (d) they coerce, deceive, or trick companies into acting against those companies own interests and/or into making poor decisions for the Plaintiffs' financial gain;
- (e) they knowingly, intentionally or recklessly encourage and/or engage in conflicts of interests for ulterior purposes;
- (f) the Anson Funds lost millions of dollars due to the reckless conduct of its principals;
- (g) they engaged in illegal and unlawful activity including securities law violations, such as insider trading and failing to disclose information as required by law; and
- (h) they will target, attack, harm and/or destroy more companies.

The Defamatory Manifesto

133. The Defamatory Manifesto (discussed above at paragraphs 62 to 79 and in **Appendix "E"** at paragraphs 42 to 65) in its entirety, in its natural and ordinary meaning, including its express and implied meaning in its full context, and/or by innuendo, including in conjunction with the images contained in the Defamatory Manifesto, is false and defamatory of the Plaintiffs. In addition to the natural and ordinary meanings of the statements contained in the Defamatory Manifesto, and without limiting the generality of the foregoing, the Defamatory Manifesto would lead a reasonable reader to conclude, or would mean or would be understood to mean, that Anson and its principals, including Kassam, repeatedly, intentionally and maliciously engaged in unlawful and illegal

business practices to destroy, and did destroy or cause harm to, legitimate companies and businesses, including Aphria, Zenabis and Genius Brands International (as defined in **Appendix “E”**), to increase their financial wealth. In addition, and more particularly, the Defamatory Manifesto means or would be understood to mean that Anson and its principals:

- (a) are deceptive, dishonest, deceitful, sneaky, duplicitous, immoral, unscrupulous and cannot be trusted;
- (b) lack integrity, are unethical, predatory, and corrupt;
- (c) are liars, cheats, thieves and crooks;
- (d) have not legitimately earned their success and goodwill;
- (e) are incompetent and/or inept in business;
- (f) they attempted to harm and/or destroy legitimate companies, including Tilray (as defined in **Appendix “D”**) and Facedrive, but failed due to their incompetence and/or ineptitude;
- (g) are desperate, and engage in rash, reckless and/or extreme behaviour;
- (h) engage in predatory, surreptitious and unethical business practices;
- (i) engaged in, and continue to engage in, unlawful and/or illegal activities, including securities law and/or criminal law violations, and including fraud, illegal short-selling schemes, market manipulation, abusive trading practices and insider trading;

- (j) involved other entities in their unlawful, illegal, and/or fraudulent activities;
- (k) engaged in conspiracies with other entities, including by paying for short reports and long/buy reports, in order to benefit financially;
- (l) committed, and continue to commit, crimes and/or are criminals;
- (m) are part of a criminal enterprise and/or criminal alliance;
- (n) operate their business in a manner that is contrary to applicable law and regulations;
- (o) breached, and continue to breach, securities laws and regulatory rules and policies;
- (p) unlawfully and/or illegally obtained and misused confidential/insider/material non-public information;
- (q) exploit information or resources that they have been trusted to protect;
- (r) published or participated in the creation of false research reports for the purpose of manipulating the market;
- (s) use unlawful and/or illegal means to silence critics because they have something nefarious to hide;
- (t) robbed and/or defrauded North American shareholders of millions of dollars;
- (u) harmed investors in Canada and the United States;

- (v) targeted and destroyed legitimate companies through nefarious means to increase their wealth;
- (w) made false reports to regulators and engaged in fraudulent social media campaigns to manipulate the capital markets;
- (x) inflict serious harm on the Canadian capital markets and on investors;
- (y) are involved in fraudulent activity of the kind that ought to concern authorities and regulators;
- (z) ought to be investigated, including by regulators in Canada and the United States;
- (aa) are being, have been, and/or will be investigated by regulators;
- (bb) ought to be and/or will be penalized and/or imprisoned;
- (cc) have caused, are causing, and will cause financial ruin to their partners, investors, and other capital market participants; and
- (dd) with respect to Kassam, in particular:
 - i. that he is a sociopath, engages in reprehensible and repulsive conduct, is amoral, lacks a conscience, and engages in antisocial behaviour; and
 - ii. does not exercise judgment and cannot be trusted with investors' funds.

The Second Defamatory Manifesto

134. The Second Defamatory Manifesto (discussed above at paragraphs 108 to 112) in its entirety, in its natural and ordinary meaning, including its express and implied meaning in its full context, and/or by innuendo, including in conjunction with the images contained in the Second Defamatory Manifesto, is false and defamatory of the Plaintiffs. In addition to the natural and ordinary meanings of the statements contained in the Second Defamatory Manifesto, and without limiting the generality of the foregoing, the Second Defamatory Manifesto would lead a reasonable reader to conclude, or would mean or would be understood to mean, that Anson and its principals, including Kassam, repeatedly, intentionally and maliciously engaged in unlawful and illegal business practices to destroy, and did destroy or cause harm to, legitimate companies and businesses in order to increase their financial wealth, including Zoom, Facedrive, GSX Tchedu, Genius Brands International, Gamestop, RECO, Valorem Resources, Starr Peak Mining, Whole Earth Brands, United Lithium, Mountain Valley MD Holdings, SOL Global, Clean Power Capital Corp, Red White & Bloom, Moderna, Medivolve, AMM Power, Value Line, Champignon Brands, Madmen, and Zenabis. In addition, and more particularly, the Defamatory Manifesto means or would be understood to mean that Anson and its principals:

- (a) engaged in, and continue to engage in, unlawful and/or illegal activities, including securities law and/or criminal law violations, and including fraud, illegal short-selling schemes, market manipulation, abusive trading practices, insider trading, filing false financial reporting, and bribery;

- (b) manipulate the stock market, including through social media;
- (c) deliberately try to destroy, and in fact destroy, legitimate companies;
- (d) deliberately cause harm to ordinary shareholders, including loss of savings or investments;
- (e) conspired with media outlets to disseminate false reporting regarding legitimate companies;
- (f) ought to be investigated, including by regulators in Canada and the United States;
- (g) are being, have been, and/or will be investigated by regulators; and
- (h) ought to be and/or will be penalized and/or imprisoned.

Stafford Unlawful Stockhouse Statements

135. The Stafford Unlawful Stockhouse Statements (discussed above at paragraph 106 and in **Appendix “E”** at paragraph 93) in their entirety, in their natural and ordinary meaning, including their express and implied meaning in their full context, and/or by innuendo, are false and defamatory of the Plaintiffs. In addition to the natural and ordinary meanings of the Unlawful Statements contained in the Stafford Unlawful Stockhouse Statements, and without limiting the generality of the foregoing, the Stafford Unlawful Stockhouse Statements would lead a reasonable reader to conclude, or would mean or would be understood to mean, the following regarding Anson and its principals:

- (a) they are corrupt, dishonest, deceptive, duplicitous and cannot be trusted;

- (b) they destroy and/or devalue companies and their shareholders through nefarious means in order to benefit financially;
- (c) they engage in unlawful and illegal activities, including market manipulation, abusive trading practices, and securities law and/or criminal law violations, and conspire with others, including financial institutions, in these unlawful and illegal activities;
- (d) their unlawful and illegal conduct has ruined the market;
- (e) they published or participated in the creation of false research reports for the purpose of manipulating the market;
- (f) they are unable to control their investments/trading strategies, and/or are inept, incompetent and reckless in their investment/trading practices; and
- (g) they should be investigated, including by regulators.

Robert Lee Doxtator's Defamatory Tweets

136. In addition to the foregoing and as set out below, the Defendant Robert is liable to the Plaintiffs for defamation in relation to a number of tweets he published under the username "Betting Bruiser". The defamatory tweets of which the Plaintiffs are currently aware are included as **Appendix "A"**. They include, but are not limited to, the following:

- (a) as discussed above at paragraph 51(a) an August 25, 2019 tweet from "Betting Bruiser" falsely alleged that the Plaintiffs put out a false report "to manipulate the market so they could cover an already short position";

- (b) as discussed above at paragraph 51(b) another August 25, 2019 tweet from “Betting Bruiser” falsely alleged that the Plaintiffs had “connections to other short sellers and market manipulators” and “historically invested [in] and the death spiral the fund created to cash out their short positions”;
- (c) as discussed above at paragraph 51(c) on August 26, 2019, “Betting Bruiser” published several tweets falsely alleging that the Plaintiffs used a representative on Zenabis’ Board of Directors, Adam Spears, to negatively influence the company’s business decisions, reduce its share price and provide them with inside information/material non-public information;
- (d) as discussed above at paragraph 51(d), a subsequent tweet on August 26, 2019 alleged that Spears was “recording conversations of [Zenabis] management and executives in hopes of Anson blackmailing or using the info for the detriment of the company”;
- (e) as discussed above at paragraph 94, a September 29, 2020 tweet from “Betting Bruiser” falsely alleged that the Plaintiffs use “tactics” that “are simply sleight of hand with the gift of gab”;
- (f) as discussed in **Appendix “E”** at paragraph 80, in a subsequent tweet on September 30, Robert alleged that the Plaintiffs “use people and don’t pay anyone but themselves”;
- (g) as discussed above at paragraph 101 and in **Appendix “E”** at paragraph 83, on October 9 Robert published a series of tweets, falsely alleging a

“toxic financing deal” involving Anson’s legal counsel, that Anson Funds investors ought to “be prepared to have [their] funds locked up” given the information indicating “scams to benefit...Kassam” and allegations “he broke the law”, threatening to “speak to regulators about Anson Funds” to collect a reward, and falsely alleging that the Plaintiffs pay Ben Axler;

- (h) as discussed in **Appendix “E”** at paragraph 87, on October 30, Robert published tweets alleging that Kassam is “running scared from recent reports about his tactics” and “the scum of the earth”, and that he has others do “his dirty work for him”.

137. These tweets, in their natural and ordinary meaning, including their express and implied meaning, and/or by innuendo, are false and defamatory of the Plaintiffs. In addition to the plain and ordinary meaning of each of the tweets, they would lead a reasonable reader to conclude, or would mean or would be understood to mean, that Anson and its principals, including Kassam:

- (a) are liars, are dishonest, duplicitous, immoral, deceptive, unscrupulous, unethical, sneaky, and cannot be trusted;
- (b) engage in unlawful and illegal conduct, including securities law and/or criminal law violations, and including insider trading, market manipulation, abusive trading practices and fraud; and
- (c) destroy legitimate businesses through nefarious means for their financial gain.

138. Additionally, the October 9 series of Tweets, in addition to their plain and ordinary meaning, would lead readers to conclude, or would mean or would be understood to mean, that Anson and its principals, including Kassam:

- (a) ought to be and will be investigated, including by regulators; and
- (b) will cause harm to their investors.

Jacob Doxtator's Defamatory Tweets

139. In addition to the foregoing and as set out below, the Defendant Jacob is liable to the Plaintiffs for defamation in relation to a number of tweets he published using the alter-ego named "John Murphy" with the username @JohnMur67039142, which are, in their natural and ordinary meaning, including their express and implied meaning, and/or by innuendo, are false and defamatory of the Plaintiffs. The defamatory tweets of which the Plaintiffs are currently aware are included as **Appendix "B"**, and include, but are not limited to, the following:

- (a) as discussed in **Appendix "E"** at paragraph 28, an August 14, 2020 retweet falsely claimed that Anson was behind the Hindenburg Research report regarding Aphria, included a picture of Kassam, and stated "how dirty moez hurt his business partner [sic] and lied to the founders of \$apha [Aphria]. On the same day Jacob also tweeted that Kassam had "paid for negative promotions" regarding Facedrve, Aphria, Tilray "and many more". In addition to the plain and ordinary meaning of these tweets, the tweets

would lead a reasonable reader to conclude that Anson and its principals, including Kassam:

- i. are corrupt, dishonest, deceitful, deceptive, duplicitous, and cannot be trusted;
 - ii. engaged in malicious, unlawful, and targeted attacks to harm legitimate companies and their shareholders; and
 - iii. provided false, fraudulent, or misleading information about legitimate companies (including Aphria, Facedrive and Tilray) for publication and dissemination to harm them;
- (b) as discussed above at paragraph 64, a September 10, 2020 tweet stated that regulators should scrutinize Anson and Kassam: “these reverse pump and dumps must be watched more closely by the regulators. moez [sic] and his band fund these trades every week...” In addition to the plain and ordinary meaning of the tweet, the tweet would lead a reasonable reader to conclude that Anson and its principals, including Kassam:
- i. engage in unlawful and illegal activities, including securities law violations; and
 - ii. ought to be investigated, including by regulators;
- (c) as discussed above at paragraph 65 and in **Appendix “E”** at paragraph 79, a September 12, 2020 tweet alleged “anson [sic] is a very corrupt cad fund

nake [sic] shorting many small cap co's and when they get in trouble / want to cover they pay groups like @HindenburgRes to say the co is a fraud and going to zero. how many zeros have they called. the bottom is normally around when the piece comes out". On September 29, he added, "big difference from shorting a fraud and paying for a short report calling a company a fraud to try and fix your trade. bad companies need to be taken down. big difference between the two. anson does both! [sic]". In addition to the plain and ordinary meaning of these tweets, the tweets would lead a reasonable reader to conclude that Anson and its principals, including Kassam:

- i. are corrupt, reckless and dishonest; and
 - ii. provide false, fraudulent, or misleading information about legitimate companies to harm those companies and benefit themselves; and
- (d) as discussed in **Appendix "E"** at paragraphs 78 and 82, two September 29, 2020 tweets included a link to the Defamatory Manifesto, and stated: "stockmanipulators.com. Cyber crimes added to the list of wrongdoings by @AnsonGroupFunds ? who funded this defense? Unit holders?", and "sounds like #moez attacked the site where the @AnsonGroupFunds report was profiled. a very expensive DDOS attack to prevent the public from seeing the piece. Investors in the fund probably have plenty of questions for @MunchingMoez @davidmilstead \$apha \$fd \$shrm many more". In addition to the plain and ordinary meaning of these tweets, these tweets

would lead a reasonable reader to conclude that Anson and its principals, including Kassam:

- i. engage in illegal and unlawful activities, including criminal law violations and are criminals;
- ii. are dishonest and deceptive; and
- iii. misuse investor funds, including for their personal benefit.

140. Jacob is also liable for using the “John Murphy” Twitter account to re-tweet other Twitter users’ false and defamatory statements about the Plaintiffs.

The Unsolicited Emails are Defamatory

141. As discussed above at paragraph 92 and in **Appendix “E”** at paragraphs 73 to 75, the Defendants anonymously sent Unsolicited Emails regarding the Plaintiffs. The Unsolicited Emails, in their entirety, in their natural and ordinary meaning, including their express and implied meaning in their full context, and/or by innuendo, are false and defamatory of the Plaintiffs. In addition to the natural and ordinary meanings of the Unlawful Statements contained in the Unsolicited Emails, and without limiting the generality of the foregoing, the Unsolicited Emails would lead a reasonable reader to conclude, or would mean or would be understood to mean, the following regarding Anson and its principals, including Kassam:

- (a) they engage in wrongdoing, unlawful, illegal, and unethical conduct, including securities law and/or criminal law violations, insider trading, market manipulation, abusive trading practices, fraud and cybercrimes;

- (b) they destroy legitimate businesses through nefarious means;
- (c) they have robbed shareholders of billions of dollars;
- (d) they are dishonest and cannot be trusted; and
- (e) they are criminals.

142. The Plaintiffs have not seen all of the Unsolicited Emails or any of the emails in their entirety and reserve their right to amend this pleading to add additional meanings and/or claims once they are discovered.

The Defendants were Malicious

143. The Defendants acted with malice: they made, assisted with, participated in and/or publicized the Unlawful Statements, knowing that the Unlawful Statements were false or misleading and/or while intentionally, recklessly or callously disregarding their falsity and the harm that the allegations would do to the Plaintiffs. They acted for the predominant purposes of harming the Plaintiffs, including in pursuit of their animus and vendetta against the Plaintiffs. Examples of the Defendants' malicious conduct include the following:

- (a) the Defamatory Manifesto, the Second Defamatory Manifesto, the Additional Unlawful Posts and other Unlawful Statements solicited readers to confidentially provide additional material for future Defamatory Manifestos;
- (b) the Second Defamatory Manifesto is nearly 10,000 words – even longer than the original Defamatory Manifesto – and repeated and/or amplified

many false and defamatory allegations contained in the Defamatory Manifesto and other Unlawful Statements, and/or elaborated on those allegations and made new and additional false and defamatory allegations against the Plaintiffs;

- (c) Stafford, Rudensky and Robert specifically targeted and maliciously intended to cause harm to the Plaintiffs by writing, publishing, disseminating, and/or procuring the writing, publishing and dissemination of the Defamatory Manifesto and the Second Defamatory Manifesto, including, for Stafford, because of his financial interest in Facedrive and/or RECO. Stafford was directly or indirectly hired to promote these companies and owned a significant number of their shares, and he publicly falsely accused Anson of hiring market participants and media to publish critical commentary on these companies using fabricated material. In fact, market participants and media analysed these companies, using publicly available information, because the companies' inflated share prices were grossly disproportionate to their fundamental value. In well functioning capital markets, it is in the normal course for market participants to comment critically on overvalued companies, and to discuss, share and comment on research, due diligence and investment theses with one another;
- (d) the Defendants' continuous and ongoing efforts to draw the Unlawful Statements to the attention of regulators and the media; and

- (e) in addition to publishing the Unlawful Stockhouse Statements in summer 2020, from fall 2020 and continuing to at least spring 2021, the Defendants published, hired others to publish or otherwise procured the publishing of, over 1,000 Further Unlawful Stockhouse Statements, which repeated, amplified and/or elaborated on the false and defamatory allegations contained in the Unlawful Stockhouse Statements, the Defamatory Manifesto, and other Unlawful Statements, and significantly increased the likelihood that such allegations would be re-published by others, as set out below. Stafford also published the Stafford Unlawful Stockhouse Statements using the username “ToffRaffles” between November 2020 and March 2021.

144. The Defendants repeatedly published the Unlawful Statements on various websites and through various means, including through the Unlawful Stockhouse Statements, the Further Unlawful Stockhouse Statements, the Unsolicited Emails, the Defamatory Manifesto, the Second Defamatory Manifesto, the Additional Unlawful Posts, and the tweets described above, in an attempt to publish them to the widest audience possible and cause the greatest possible commercial and emotional harm to the Plaintiffs.

The Defendants are liable for republication of the Unlawful Statements

145. The Defendants are also liable for republication of all of the Unlawful Statements, which was a natural and probable result of the Unlawful Statements given, among other things, the volume of Unlawful Statements published and publicized by the Defendants. In fact, the Defendants actively encouraged republication of the Defamatory Manifesto

and Second Defamatory Manifesto, both in the text of the Defamatory Manifesto and Second Defamatory Manifesto themselves, and in Robert's and Jacob's tweets sharing the Defamatory Manifesto. Many of the nearly 1,000 Further Unlawful Stockhouse Statements also actively encouraged the republication of the Defamatory Manifesto and/or other Unlawful Statements. Republications of the Defamatory Manifesto and Second Defamatory Manifesto currently remain online.

F. DAMAGES

146. The Defendants' conduct has caused substantial damage to the Plaintiffs' business and reputations. The Unlawful Statements have been widely distributed and publicized and have been viewed by thousands of people to date. Versions of the Defamatory Manifesto and the Second Defamatory Manifesto remains widely available on the Internet. The Unlawful Statements have significantly interfered with and disrupted the Plaintiffs' business and affairs and their relationship with clients, counterparties, and potential investors, leading to a loss of business opportunities.

147. Moreover, the Plaintiffs have incurred significant costs and spent a significant amount of time investigating who is behind the Conspiracy and in seeking to have the Unlawful Statements removed from various websites.

148. As mentioned above, Anson has also received threatening telephone calls to its offices because of the Unlawful Statements.

149. Particulars regarding damages will be provided in advance of trial.

150. The Plaintiffs also seek an interim, interlocutory and permanent injunction restraining the Defendants from publishing further unlawful and defamatory statements about the Plaintiffs. As noted above, despite Anson's diligent attempts to have the Defamatory Manifesto and Unlawful Stockhouse Statements removed from the Internet, the Defendants persist in acquiring new websites to publish and disseminate the Defamatory Manifesto, the Second Defamatory Manifesto and Additional Unlawful Posts; in repeating the Unlawful Statements and publicizing the Defamatory Manifesto and Second Defamatory Manifesto through social media, including Twitter; and in publishing the Further Unlawful Stockhouse Statements, which publicized and disseminated the Defamatory Manifesto, Second Defamatory Manifesto and other Unlawful Statements. In addition, the Defendants threatened the release of two additional "Parts" to the Defamatory Manifesto. They have released one additional "Part", the Second Defamatory Manifesto, as well as the Additional Unlawful Posts about the Plaintiffs. This conduct has caused, is causing, and will continue to cause irreparable harm to the Plaintiffs' business and their reputations. This nonstop game of "whack-a-mole" cries out for a remedy.

151. Finally, the Defendants are liable for aggravated and punitive or exemplary damages. The Defendants maliciously and intentionally caused harm to the Plaintiffs through the repeated and coordinated and continuing publication, and broad online dissemination, of the Unlawful Statements. Further, Robert attempted to obtain significant payments and other benefits to purportedly assist Anson, which Anson refused. The Defendants knew, and in fact intended, that serious harm would result from their unlawful conduct.

152. The Defendants executed a coordinated, malicious campaign to spread lies about the Plaintiffs and damage their business, including attempting to reach the attention of securities regulators such as the OSC, the SEC, and IIROC. The Plaintiffs believe that the Defendants intended to cause them to become the subject of regulatory inquiries or investigations on the basis of these false and misleading allegations. Such inquiries or investigations would result in serious and irreparable reputational harm, and in addition would force the Plaintiffs to divert significant time, financial and other resources, and management attention, towards addressing any such inquiries or investigations. The Defendants also took steps to attract media attention to the Unlawful Statements in an attempt to further publicize them. The Defendants acted in a high-handed, malicious, arbitrary and/or highly reprehensible manner, as set above, which constitutes a marked departure from ordinary standards of decent behaviour. The Defendants' conduct requires the sanction of the Court.

153. The Plaintiffs propose that this action be tried at Toronto.

154. The Plaintiffs rely on the *Libel and Slander Act*, R.S.O. 1990, c. L.12 and the *Courts of Justice Act*, R.S.O. 1990, c. C.43, s. 101.

155. This pleading may be served outside of Ontario without a court order pursuant to Rules 17.02(g), (i) and (p) of the *Rules of Civil Procedure* because this proceeding relates to a claim or claims in respect of one or more torts committed in Ontario, seeks an injunction ordering a party to do or refrain from doing anything in Ontario, and is against one or more persons ordinarily resident or carrying on business in Ontario.

December 17, 2020

Amended on November 22, 2021

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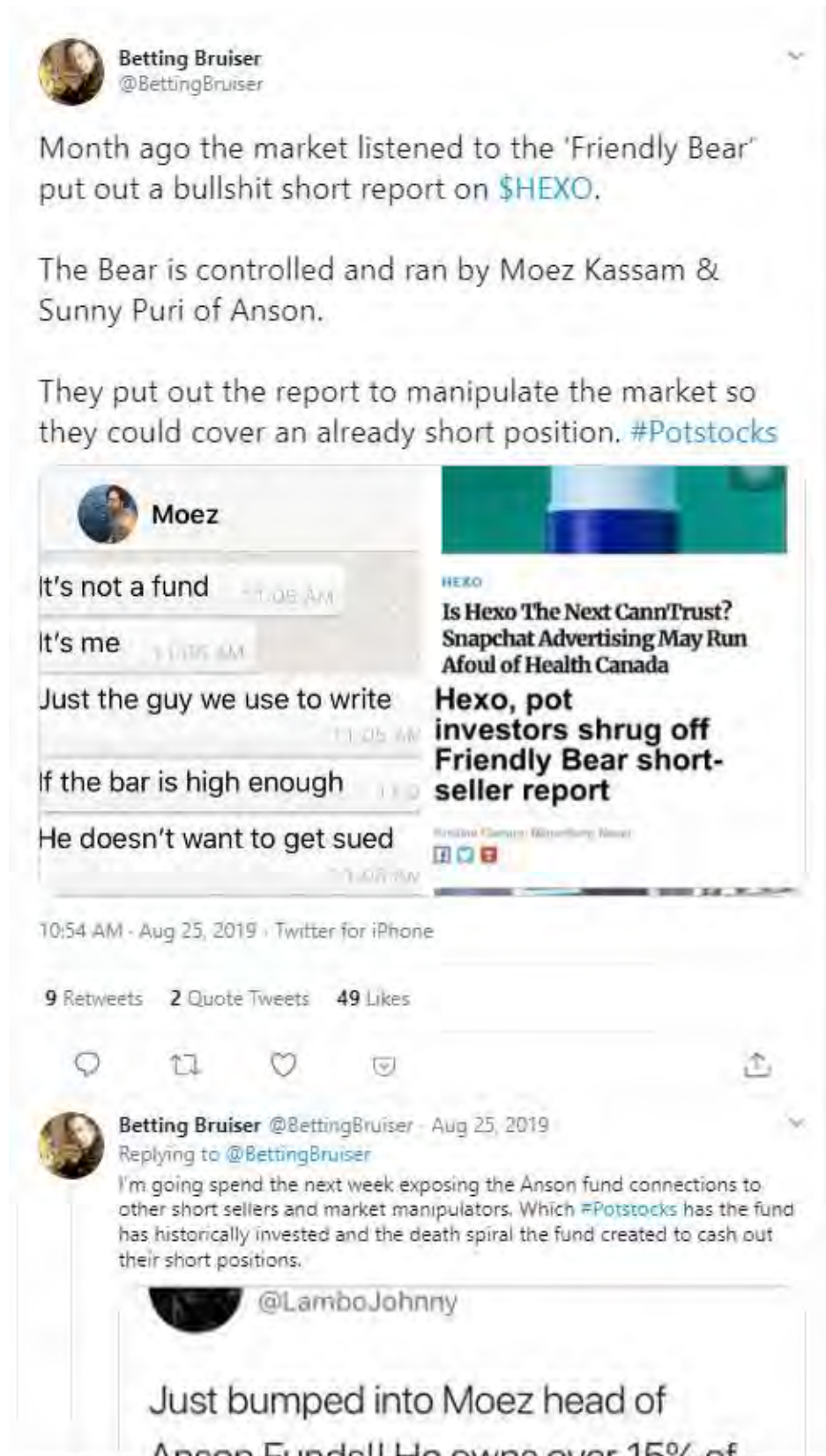
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APPENDIX "A" – "Betting Bruiser" Tweets











Betting Bruiser
@BettingBruiser

A lot DM's about \$ZENA & Anson Funds.

Anson Funds holds a boatload of converts in \$ZENA that they are using to cover their short position.

They've had a direct hand creating chaos within management decisions. Including the listing price. How so? Anson representative! #Potstocks







Adam Spears
Independent Director

- Founder of ace148, an investment company
- Was a Principal and Portfolio Manager at Anson Funds where he managed multiple long-short equity hedge funds
- Also worked in private equity at ONCAP Management Partners, and in the investment banking group of Citigroup Global Markets

9:09 AM · Aug 26, 2019 · Twitter for iPhone

4 Retweets · 4 Quote Tweets · 35 Likes

-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
Replying to @BettingBruiser
The entire problems relating to the former CEO leaving, taking the \$TLRY deal and now death spiral financing. Was in relation to \$ZENA attempting to limit Anson's ability to cover and manipulate the share price down further. The current \$ZENA CEO is out of league. #Potstocks
-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
\$TLRY themselves wanted to offer a helping hand. As that company is the only successful #Potstocks to date to squeeze Anson Funds for a loss to my knowledge. Despite Anson Funds getting @CitronResearch to pump out as many \$TLRY short pieces it possibly could. #Potstocks
-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
I'd love to talk to the @CEO_Zenabis to try to help... but it may be a case of little to late ... CEO wants to convert all debts to a bank loan... that's a start but expect Anson Funds to fight tooth and nail against that. Their independent director acts for Anson. #Potstocks
-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
As in the case with \$HEXO ... I wouldn't doubt that Adam is recording conversations of \$ZENA management and executives in hopes of Anson blackmailing or using the info for the detriment of the company. Adam needs to be removed. #Potstocks
-  **Chris Rutherford** @RutherfordCG · Aug 26, 2019
Replying to @BettingBruiser
How is it legal for Adam to be on the board and do what this guy is doing? It's not in the best interests of @Zenabis obviously. @CEO_Zenabis
-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
No it's not ... like \$AEF Anson will argue that they acting in best interest of the shareholder ... all a guise ...







Betting Bruiser
@BettingBruiser

...

The biggest chicken hawk that I've ever met in my life.
Every time I see him we have words.

Sunny Puri from Anson Funds.

If you've ever crossed paths with him then your stock is
likely -95% from its high and he holds your faint in his
hands via convertible debt. [#PotStocks](#)



11:11 AM - Mar 11, 2020 · Twitter for iPhone

4 Retweets 39 Likes



Betting Bruiser
@BettingBruiser

...

Watch "Moez Kassam" from Anson Funds on [#Vimeo](#) give short sellers a bad name. Cringe worthy. I think that's filmed at [@DeFrancesco_A](#) house in the Muskoka? vimeo.com/140274640 [#PotStocks](#)



Moez Kassam

This is "Moez Kassam" by Charles Chan on Vimeo, the home for high quality videos and the people who love them.
vimeo.com

1:54 PM · Jul 2, 2020 · Twitter for iPhone



Betting Bruiser
@BettingBruiser

...

Replying to [@BettingBruiser](#)

Director: Rick Brar former CEO & Co-Founder of [@Zenabis](#) [\\$ZENA](#)

Secretly gave Anson Funds a share loan agreemnt so they could short [\\$ZENA](#) to the dismay of retail investors. Upon finalizing that he aggressively dumped all his shares. [\\$ZENA](#) -98%. \$2.25 to \$0.08 [#PotStocks](#)
2/9

9:50 AM · Jul 6, 2020 · Twitter for iPhone



8 Retweets 2 Quote Tweets 63 Likes



Betting Bruiser
@BettingBruiser

photo

Something that was wrong about the Anson and Moez article circulating was the allegation that Moez/Anson compensates people to write reports. They just use people and don't pay anyone but themselves. \$ZENA \$APHA #PotStocks

11:08 AM · Sep 30, 2020 · Twitter for iPhone

2 Retweets · 28 Likes



Betting Bruiser
@BettingBruiser

One thing that was left out of the [\\$ZENA](#) and Anson Funds report was fact that Anson's funds legal counsel (Laura Salvatori) husband (Muneeb Yusuf) via Brownstone Advisors facilitated the toxic financing deal between [\\$ZENA](#) & [\\$TLRY](#) ... conflict of interest much? [#Potstocks](#)



Brownstone Advisors Inc. ("Brownstone") acted as strategic advisors to Zenabis in connection with the Supply Agreement. Zenabis will pay a strategic advisory fee to Brownstone, which fee will include (subject to receipt of all required regulatory approvals) 319,148 common shares of Zenabis.



Corporate Director
Brownstone Capital
2018 - Present • 2 y
Toronto, Canada Area

1:50 PM · Oct 9, 2020 · Twitter for iPhone



Betting Bruiser @BettingBruiser · Oct 9

Replying to @BettingBruiser

Hi Laura 🙋 ... cause I know you follow every tweet I speak about Anson ... I thought I'd give you a shoutout! [\\$ZENA](#) [\\$TLRY](#) [#PotStocks](#)



4



38



Betting Bruiser @BettingBruiser · Oct 9

If you r an Anson Fund investor ... be prepared to have your funds locked up b/c there is a lot information floating out there that paints a picture of scams to benefit none other then Moez Kassam. [\\$ZENA](#) story is just one of hundreds were its alleged he broke the law. [#PotStocks](#)



4



32





Betting Bruiser
@BettingBruiser



Maybe I should speak to regulators about Anson Funds
and collect the reward in 50 years

Or should I just leak snippets of recorded conversations
with Moez Kassam?

Thoughts? [#PotStocks](#)



2:17 PM · Oct 9, 2020 · Twitter for iPhone

6 Retweets 1 Quote Tweet 83 Likes



Betting Bruiser
@BettingBruiser

I think I'm going release some of the recordings about Moez Kassam ... just interested how much money Anson pays Ben Axler from @sprucepointcap ... you care to comment Ben?

"You know what's gonna happen"

14:47

"A lot of times if I'm working with Ben (Axler) or doing this kind of stuff (shorts) than **we can create our own catalysts right because we're putting out a report**"

"So I know when stuffs gonna go down and I'll buy puts"

3:19 PM · Oct 9, 2020 · Twitter for iPhone

3 Retweets **2** Quote Tweets **64** Likes



Betting Bruiser
@BettingBruiser

Everyone have a good long weekend expect for Anson Funds Moez Kassam he can choke on a wishbone!
[#PotStocks](#)

4:55 PM · Oct 9, 2020 · Twitter for iPhone

4 Retweets **1** Quote Tweet **105** Likes



Betting Bruiser
@BettingBruiser

...

Has Anson Funds and/or MMCAP name all over it
\$VIVO #PotStocks

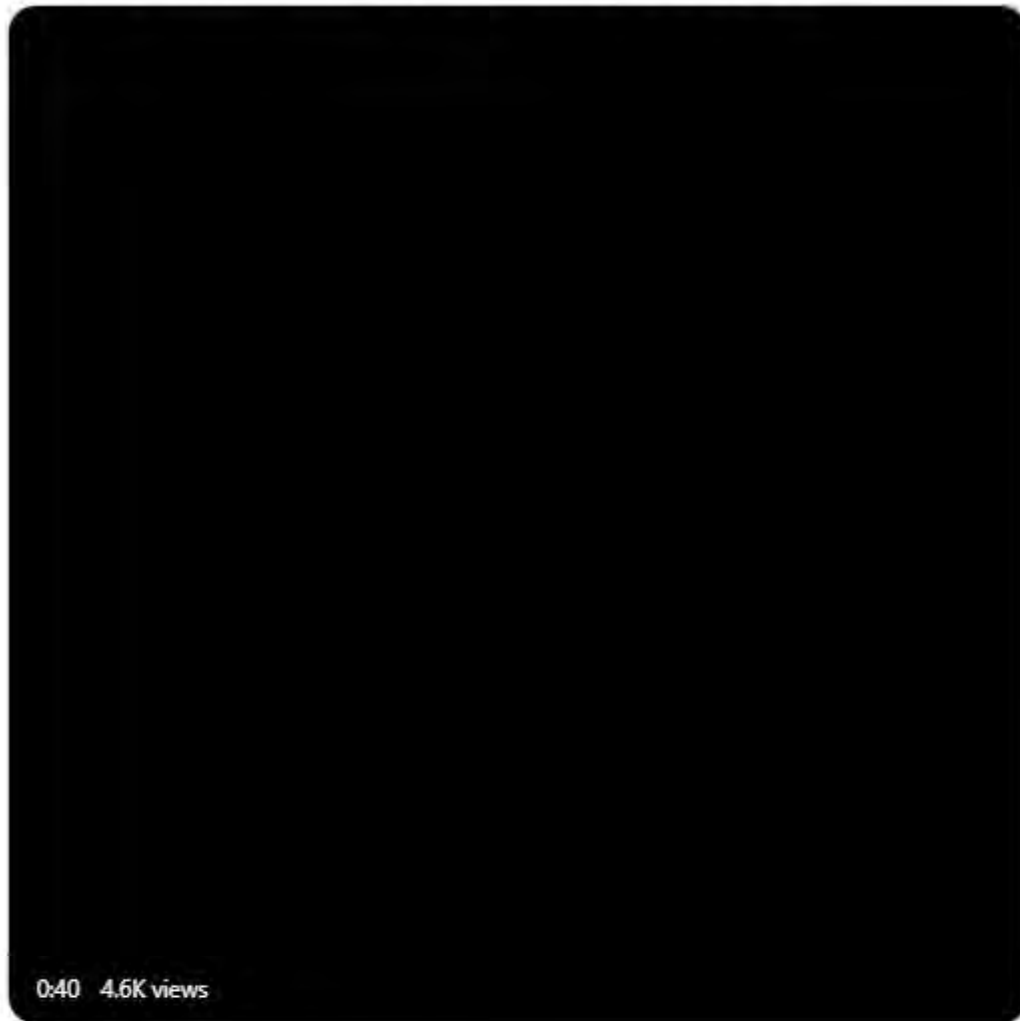


8:33 AM · Oct 16, 2020 · Twitter for iPhone



Betting Bruiser
@BettingBruiser

This is Moez Kassam from Anson Funds in the flesh running scared from recent reports about his tactics. Worth a listen. This guy is scum of the earth.



10:50 AM · Oct 30, 2020 · Twitter for iPhone





Betting Bruiser
@BettingBruiser

...

Happy Halloween to the #PotStocks community!

Trick or Treat:

Who is going to toilet paper Moez Kassams house tonight? \$ZENA executives should just throw stock as it's cheaper then toilet paper!



12:48 PM · Oct 31, 2020 · Twitter for iPhone

APPENDIX “B” – “John Murphy” Tweets





John Murphy @JohnMur67039142 · Jul 24

@MunchingMoez #ansonfunds, paid for the report as they were caught offside, rumours off 900k in the single digits, called in a favor and doubled down @HindenburgRes moez was telling ppl it was going to 6.00, even called prop desks wanting them to short



John Murphy
@JohnMur67039142



it seems moez and sunny from @AnsonGroupFunds @MunchingMoez @HindenburgRes @globeandmail @davidmilstead quickly blocked me by suggesting they were short 1mm \$FD. i think much more will come out on this trade. @business @BNNBloomberg



John Murphy @JohnMur67039142 · Jul 28

Looks like @facedrivecanada \$FD is going higher @HindenburgRes @AnsonGroupFunds finance.yahoo.com/news/400-tesla...

7:41 PM · Jul 30, 2020 · Twitter for iPhone



John Murphy @JohnMur67039142 · Aug 14

@HindenburgRes @BNNBloomberg @AnsonGroupFunds this story will be all over the street within months. how dirty **moez** hurt his business parnter and lied to the founders of **Sapha**. @LamboJohnny @BettingBruiser



MDeCicco @MDeCicco_ · Aug 14

Hey @MunchingMoez. Can you confirm/deny? The word around is that you were the source of the @HindenburgRes Short Attack on @aphriainc, to cover HUGE losses on \$TLRY

[Show this thread](#)



John Murphy @JohnMur67039142 · Aug 14

SFD #moezkassam paid for negative promotions on **SFD Sapha \$tlry** and many more, was this disclosed by publisher? @AnsonGroupFunds @HindenburgRes @BNNBloomberg @BettingBruiser \$tlry Sapha #shortsellers @IIROCinfo



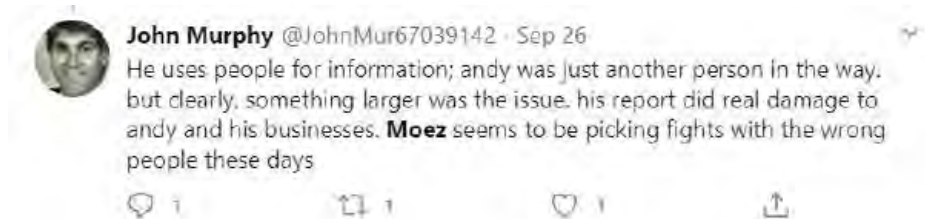
Stockhouse.

Just read this on Yahoo: short seller Moez Kassam go...
Just read this on Yahoo: short seller Moez Kassam got
BURNED

stockhouse.com







Jim Retweeted



John Murphy @JohnMur67039142 · 27 Sep

8 Capital's [#tradertonny](#), plays right into the stereotype of a [#WallStreet](#) trader. i think his compliance might have some questions about the recommendations that he has been putting out.... [#viiiicapital](#)
[@MunchingMoez](#) stockmanipulators.com/moez-kassam-an...



John Murphy @JohnMur67039142 · Sep 29

sounds like [#moez](#) attacked the site where the [@AnsonGroupFunds](#) report was profiled. a very expensive DDOS attack to prevent the public from seeing the piece. Investors in the fund probably have plenty of questions for [@MunchingMoez](#) [@davidmilstead](#) \$apha \$fd \$gfi \$shrm many more



John Murphy @JohnMur67039142 · 15m

spicy. stinks something awful !!! [#handsomefunds](#) [#dirtymoez](#)
[#moezkassam](#) [@AnsonGroupFunds](#) [@LamboJohnny](#) [@QTRResearch](#)
[@weedstreet420](#) [@ddale8](#)



John Murphy @JohnMur67039142 · Sep 27

i wonder if this slows down his extravagant dinners that he posts every night. sean kallir from HGC seems to be in attendance often. [moez's](#) new member. special shout out to [#tradertonny](#) from 8capital. love the pics





John Murphy @JohnMur67039142 · Sep 29

big difference from shorting a fraud and paying for a short report calling a company a fraud to try and fix your trade. bad companies need to be taken down. big difference between the two. **anson** does both!



John Murphy
@JohnMur67039142

Home stockmanipulators.com. Cyber crimes added to the list of wrongdoings by @AnsonGroupFunds ? who funded this defense? unit holders? @davidmilstead @globeandmail @thomasg_grizzle

7:52 AM · Sep 29, 2020 · Twitter for iPhone



John Murphy @JohnMur67039142 · Sep 30

chatter is \$300k-400 for that report. a deep audit of **anson's** books might help.



John Murphy @JohnMur67039142 · Sep 30

Anson and Moez put out this response. it fails to address the allegations outlined, when they question a company they ask for a line by line response. we are waiting @MunchingMoez [ansonfunds.com/wp-content/upl...](https://ansonfunds.com/wp-content/uploads/2020/09/Anson-Response-to-Questions-Regarding-Short-Selling-Operations.pdf) @QTRResearch @BettingBruiser @LamboJohnny @weedstreet420 @davidmilstead







APPENDIX “C” – James Stafford

A. Stafford’s Background

1. In his capacity as a stock promoter, Stafford has been involved in numerous pump and dump securities schemes, including several of the companies mentioned in the Unlawful Statements. Stafford’s role in such schemes is to disseminate via the Internet sensationalist and misleading information regarding his clients (usually publicly traded issuers) with the intention of increasing – artificially and often temporarily – the trading volume and price of securities of the company. Those who sell shares in the company while the stock price is inflated – including proponents of the pump and dump scheme – enjoy significant profits, whereas unsophisticated investors (often retail investors) are habitually faced with significant losses when the share price declines back to its intrinsic value. This is also known as the “pump and dump”.

2. While Stafford’s articles on www.OilPrice.com purport to be – and are intentionally designed to appear as – objective news reports, they are promotional materials. Stafford is often directly paid for his articles on www.OilPrice.com in cash or shares by the companies whose securities he is promoting. As such, he often owns securities in the company at issue and is incentivized to increase both their trading price and volume. The disclaimers attached to the bottom of Stafford’s articles on www.OilPrice.com acknowledge this and specifically acknowledge the temporary effects of his pump and dump scheme.

3. The following is a typical example of the disclaimers attached to Stafford’s articles. It appeared at the bottom of an article titled “Is This The Hottest Oil Play Of The Year”,

published January 14, 2021 regarding RECO. It acknowledges that Stafford and/or his companies were paid \$70,000 to write a single article, and that they own shares in RECO:

ADVERTISEMENT: This communication is not a recommendation to buy or sell securities. OilPrice.com, Advanced Media Solutions Ltd., and their owners, managers, employees, and assigns (collectively the “Company”) have been paid by [RECO] seventy thousand U.S. dollars to write and disseminate this article. As the Company has been paid for this article, there is a major conflict with our ability to be unbiased, more specifically:

This communication is for entertainment purposes only. Never invest purely based on our communication. We have not been compensated but may in the future be compensated to conduct investor awareness advertising and marketing for [RECO]. Therefore, this communication should be viewed as a commercial advertisement only. We have not investigated the background of the company. **Frequently companies profiled in our alerts experience a large increase in volume and share price during the course of investor awareness marketing, which often end as soon as the investor awareness marketing ceases.** The information in our communications and on our website has not been independently verified and is not guaranteed to be correct.

SHARE OWNERSHIP: The owner of Oilprice.com owns shares of this featured company and therefore has an additional incentive to see the featured company’s stock perform well. The owner of Oilprice.com will not notify the market when it decides to buy more or sell shares of the issuer in the market. The owner of Oilprice.com will be buying and selling shares of the issuer for its own profit. This is why we stress that you conduct extensive due diligence as well as seek the advice of your financial advisor or a registered broker-dealer before investing in any securities. [Bolded emphasis added.]

B. Stafford’s Animus Towards the Plaintiffs

4. Stafford was hired, directly and/or indirectly, to promote, and artificially inflate the volume and/or price of, Facedrive shares using his website, www.OilPrice.com. Since March 2020, Stafford and/or his companies have published over seventy sensationalist posts about Facedrive (a full list is set out in Section D of this Appendix), with titles including “Could This Be One Of The Best Ways To Play The EV Boom This Summer?”

and “The \$110 Trillion Trend That Bezos, Buffett And Musk Are Betting On”. The public disclosure on www.OilPrice.com stated that:

- (a) Stafford and/or his companies “signed an agreement [with Facedrive] to be paid in shares to provide services to expand ridership and attract drivers in certain jurisdictions outside Canada and the United States” – although, in fact, Stafford and/or his companies was hired for stock promotion purposes;
- (b) Stafford “has acquired additional shares of FaceDrive...for personal investment” and that, as a result, Stafford and/or his companies have “a substantial incentive to see the featured company’s stock perform well”; and
- (c) www.OilPrice.com’s purported articles about Facedrive “**should be viewed as a commercial advertisement only. We have not investigated the background of the featured company. Frequently companies profiled in our alerts experience a large increase in volume and share price during the course of investor awareness marketing, which often end as soon as the investor awareness marketing ceases**” (emphasis added).

5. The www.OilPrice.com disclosure does not, on its own, identify how much Stafford was paid. Many readers of www.OilPrice.com, particularly unsophisticated ones, would not have realized that the website was hired to promote Facedrive stock, and was not providing objective news and analysis about the company.

6. In total, Stafford directly and indirectly, at one point in time, owned up to approximately 1.5 million shares in Facedrive, some of which he received as compensation for stock promotion, and some of which he purchased on the open market. As a result, Stafford had a significant incentive to ensure that Facedrive's share price appreciated and remained artificially inflated. One and a half million shares of Facedrive would have been worth approximately \$90 million at Facedrive's all-time high share price of \$60 and are worth approximately \$3 million at the current share price of approximately \$2 (assuming Stafford held his shares).

7. These incentives gave Stafford the impetus to engage in the Conspiracy and spread Unlawful Statements about the Plaintiffs. Given Stafford's financial interest in Facedrive, he has an incentive to diminish and disparage critical commentary about Facedrive, published by market participants or other observers, which questions the intrinsic value of the company. On July 23, 2020, Hindenburg Research published critical research findings about Facedrive. Later that evening, the first Unlawful Statements about the Plaintiffs were published on Stockhouse.

8. Part of Hindenburg Research's critical findings about Facedrive related to a firm named Medtronics Online Solutions Ltd. ("**Medtronics**"). Facedrive, a ride-share start-up, publicly claimed that it had hired Medtronics for the purpose of broadening its ridership. Hindenburg Research's critical findings included that Medtronics was controlled by Stafford; that Medtronics was in fact a shell company that obfuscated its true purpose; and that Stafford, via Medtronics, had actually been hired to promote Facedrive's stock, not broaden ridership. Pursuant to a consulting services agreement, Facedrive was to pay Medtronics 800,000 in shares for the alleged services through a monthly fee (worth

roughly \$8 million at the time the agreement was press released by Facedrive; see also **Appendix “E”**, paragraph 45 below, where Robert indicated that Stafford was paid \$8 million to promote Facedrive). On September 9, 2020, Facedrive terminated the consulting services agreement and was of the opinion that the obligations under the agreement had been fulfilled. On November 27, 2020, the company disclosed a signed settlement agreement deeming its obligations fulfilled as of October 19, 2020. This all occurred a few months after the release of Hindenburg Research’s report regarding Facedrive, when a disagreement ended the relationship between Facedrive and Medtronics, although Medtronics still received all of its shares under the agreement. Had the consulting engagement continued, Stafford may have stood to receive more shares in Facedrive, increasing his compensation.

9. Stafford was also hired to promote, and artificially inflate the volume and/or price of, RECO’s shares. Since January 2020, Stafford and/or his companies have published over twenty sensationalist articles promoting RECO on www.OilPrice.com (a full list is set out in Section E of this Appendix), with titles including “Is This The Most Exciting Oil Stock For 2021?” and “Recon Africa: The Truth About The World’s Most Exciting Oil Play”. The disclosure on these articles indicates that Stafford was paid US\$280,000 for a series of four articles in January 2021. All of the articles consistently disclosed that Stafford and/or his companies own shares in RECO and accordingly have a substantial incentive to see the share price perform well.

10. Stafford’s financial interest in RECO once again motivated him to spread Unlawful Statements about the Plaintiffs through the Conspiracy. On June 20, 2021, The Globe and Mail published a critical article about RECO. On June 24, 2021, Viceroy Research,

another forensic research firm, expanded on The Globe and Mail's reporting and posted further critical findings about RECO. The critical findings included allegations that RECO had engaged in stock promotion and had other fundamental issues. The Second Defamatory Manifesto was published on June 28, 2021, a few days after Viceroy Research released its first report regarding RECO.

11. Given Stafford's significant financial interest and exposure to Facedrive and RECO, he publicly wrongfully used the Plaintiffs as scapegoats for their share prices declining, and in particular he blamed the Plaintiffs for the critical research findings about Facedrive and RECO. In fact, the share prices of overvalued companies decline not because of the Plaintiffs' influence, but rather because of market fundamentals, including poor performance, failures to meet the business plan, shareholder infighting, and/or corporate governance issues. Consistent with Stafford's incentives, the Unlawful Statements allege, among other things, that the Plaintiffs commissioned and paid for critical analyst and/or news reports about Facedrive and RECO based on fabricated information – both stocks that Stafford has a significant interest in inflating the value of and/or was hired to promote.

C. Stafford's Possible Location

12. Stafford's company, A Media Solutions Limited is connected with the address 4TA Priv Piedra Del Comal 21, Casa 2 col. Valle De Tepepan Tlalpan Distrito Federal Mexico, 14 646, which is near Mexico City. Stafford appears to have connections to numerous jurisdictions and it is unknown to the Plaintiffs whether Stafford's residential address is in Mexico, England, the Bahamas, or elsewhere. Some of the Unlawful Statements described in the statement of claim were published from the area surrounding Mexico City

(many from the city of Toluca) and multiple employees of www.OilPrice.com appear to be based in Mexico City or the surrounding areas.

D. List of www.OilPrice.com articles regarding Facedrive

- 1- Mar 19, 2020- The Most Exciting Green Startups To Watch In 2020
- 2- April 14, 2020- Coronavirus And The Coming Financial Revolution
- 3- May 5, 2020- The \$30 Trillion Trend That's Bigger Than The Entire U.S. Stock Market
- 4- May 28, 2020- Buffett, Bezos And Blackrock Are Betting Big On This \$30 Trillion Mega-Trend
- 5- June 8, 2020- Tech Giants Battle It Out In Billion Dollar Food Delivery War
- 6- June 15, 2020- World's Largest Hedge Fund Goes All In On This \$30 Trillion Mega-Trend
- 7- July 22, 2020- How COVID Transformed The \$70 Trillion Stock Market
- 8- July 23, 2020- Google, Apple And Amazon Are Leading A \$30 Trillion Assault On Wall Street
- 9- August 5, 2020- 1 Million Downloads In 5 Weeks – The Tech Company Fighting COVID In Canada
- 10- August 17, 2020- Bezos And Blackrock Are Pouring Billions Into This \$30.7 Trillion Trend
- 11- October 28, 2020- Blackrock, Bezos And Musk Charging Ahead in this \$30 Trillion Mega-Trend
- 12- November 4, 2020- The \$110 Trillion Trend That Bezos, Buffet And Musk Are Betting On
- 13- November 4, 2020- The Biggest Ever Transfer Of Wealth Is Happening Right Now
- 14- November 9, 2020- The Death Of Car Ownership: How Tech Is Killing The \$3 Trillion Auto Industry
- 15- November 11, 2020- The 6 Hottest Energy Tech Stocks For 2021
- 16- November 17, 2020- Blackrock and Fidelity Are Betting Big On This \$130 Trillion Mega-Trendy
- 17- November 20, 2020- The 3 Hottest Electric Vehicle Stocks Of The Year
- 18- November 24, 2020- The Investment Trend That Could Send Tesla To \$2 Trillion
- 19- November 26, 2020- Here's Why Electric Vehicle Stocks Have Exploded This Year

- 20- December 3, 2020- The Real Reason Why Tesla Is Heading Towards A Trillion-Dollar Valuation
- 21- December 6, 2020- The 3 Hottest Electric Car Stocks For 2021
- 22- December 8, 2020- How To Profit From The Death Of Car Ownership
- 23- December 9, 2020- The Electric Car Boom Is About To Get Even Hotter
- 24- December 13, 2020- Do Not Buy An Electric Car For Christmas Until You Have Read This
- 25- December 15, 2020- How An Obscure 400 Year Old Law Sparked A \$5 Trillion Transportation Revolution
- 26- December 16, 2020- 2 Electric Car Stocks To Watch In 2021
- 27- December 17, 2020- Tesla's 1,000% Stock Price Explosion Isn't About Electric Cars
- 28- December 22, 2020- How Electric Vehicle Hype Created A Brand New Trillion Dollar Market
- 29- December 22, 2020- Why DoorDash Was The Hottest IPO Of The Year
- 30- December 28, 2020- 3 Ways to Play the \$30 Trillion ESG Boom in 2021
- 31- December 28, 2020- The Great Reset: BlackRock Is Fueling A \$120 Trillion Transformation On Wall St.
- 32- December 29, 2020- The Real Reason Big Tech Dominated The Market In 2020
- 33- January 4, 2021- How 400 Year Old Blood Taxis Created A \$5.7 Trillion Industry
- 34- January 12, 2021- BlackRock Is Leading A \$120 Trillion Investment Boom That Is Upending Wall St
- 35- 06 January 2021- BlackRock Is Leading A \$120 Trillion Investment Boom That Is Upending Wall St.
- 36- 08 January 2021-3 Electric Vehicle Stocks That Could Boom In 2021
- 37- 13 January 2021-Biden's Boom: The \$30 Trillion ESG Sector Is Set To Explode In 2021
- 38- 18 January 2021-Is This The Most Exciting ESG Play Of 2021?
- 39- 20 January 2021-The Biden Boom Is Coming And These Stocks Could Soar

- 40- 22 January 2021-Biden's Green Energy Boom Could Send These Electric Vehicle Stocks Soaring
- 41- 28 January 2021-The Real Reason Tesla's Stock Exploded In 2020
- 42- 29 January 2021-Biden's Green Energy Boom Could Send The Electric Car Sector Into Overdrive
- 43- 03 February 2021-These Stocks Could Soar As The U.S.-China Electric Vehicle War Heats Up
- 44- 05 February 2021-Green Tech Could Create The First Trillionaire
- 45- 09 February 2021-2 Under The Radar Electric Vehicle Stocks That Could Soar In 2021
- 46- 11 February 2021-Biden's Clean Energy Revolution Could Send These Stocks Soaring
- 47- 15 February 2021-The Single Biggest Threat To The Electric Vehicle Boom
- 48- 17 February 2021-Biden's \$2 Trillion Green Plan Could Send This Stock Soaring
- 49- 23 February 2021-Biden Is About To Send The Electric Vehicle Revolution Into Overdrive
- 50- 26 February 2021-The Real Reason Elon Musk Could Become The World's First Trillionaire
- 51- 03 March 2021-The \$1 Trillion Electric Vehicle Boom Is Just Getting Started
- 52- 05 March 2021-The Single Biggest Threat To The Electric Vehicle Revolution
- 53- 15 March 2021-Two Tech Stocks To Watch As Biden Pours Trillions Into The Green Economy
- 54- 04 April 2021-The Future is Electric: Why EV Stocks Could Continue To Soar In 2021
- 55- 14 April 2021-Could This Be One Of The Best Ways To Play The Electric Vehicle Boom?
- 56- 16 April 2021-How To Play The \$2.6 Trillion Clean Energy Investment Boom
- 57- 11 May 2021-3 Stocks That Could Win Big From Biden's \$2 Trillion Infrastructure Plan
- 58- 13 May 2021-Biden's \$2.5 Trillion Infrastructure Plan Could Send These EV Stocks Soaring

- 59- 14 May 2021-Is This One Of The Best Ways To Play The Electric Vehicle Boom?
- 60- 17 May 2021-2 Under The Radar EV Stocks Set To Explode This Summer
- 61- 19 May 2021-One Company To Watch As Electric Vehicle Stocks Get Ready To Fly This Summer
- 62- 24 May 2021-America's Gas Crisis Could Send These EV Stocks Even Higher
- 63- 27 May 2021-Could This Be The No.1 EV Stock Of 2021?
- 64- 01 June 2021-Why EV Stocks Are Poised To Explode This Summer
- 65- 09 June 2021-These EV Stocks Could Explode Higher This Summer
- 66- 11 June 2021-America's \$2 Trillion Infrastructure Boom Could Send ESG Stocks Soaring
- 67- 20 June 2021-The Death Of Car Ownership: This \$30 Trillion Trend Could Kill The Auto Industry
- 68- 24 June 2021-The 3 Hottest Electric Vehicle Stocks For 2021
- 69- 28 June 2021-Could This Be One Of The Best Ways To Play The EV Boom This Summer?
- 70- 06 July 2021-Is This The Hottest ESG Stock Of 2021?
- 71- 09 July 2021-Biden's \$2.5 Trillion Plan Could Send These 3 EV Stocks Soaring
- 72- 14 July 2021-The Future Of Transportation: EV Stocks Could Fly This Summer
- 73- 16 July 2021-One Man Just Sent The \$30 Trillion ESG Revolution Into Overdrive

E. List of www.OilPrice.com articles regarding RECO

1. 5 Things You Need To Know About The World's Hottest Oil Play - 16 August, 2021
2. Update On The World's Most Exciting Oil Play: Interview With Scot Evans - 09 August 2021
3. Recon Africa De-Risks The World's Most Exciting Oil Find-05 August 2021
4. Is The World's Hottest Oil Play About To Surprise Markets Again?-02 August 2021
5. Why Short Sellers Are Desperately Trying (And Failing) To Sink Recon Africa-25 July 2021
6. Could This Be The Most Promising Oil Play Of The Decade?-20 July 2021
7. The Best 2 Stocks To Hold As Oil Prices Explode-15 July 2021
8. The Small Exploration Company That Shocked The Oil Industry-08 July 2021
9. Recon Africa: The Truth About The World's Most Exciting Oil Play-29 June 2021
10. Why Namibia Could Become The Biggest Oil Story of the Decade-25 June 2021
11. Is This The Most Exciting Oil Play Of The Last 20 Years?-10 June 2021
12. Is There A Huge Undisclosed Short In Oil Explorer Reconnaissance Energy Africa?-27 May 2021
13. The Best Is Yet To Come For The World's Hottest Oil Play-19 April 2021
14. Two Oil Stocks To Watch In 2021-29 January 2021
15. Could This Be The Best Way To Play The Oil Rebound?-21 January 2021
16. Is This The Hottest Oil Play Of The Year?-14 January 2021
17. The Most Important Oil Find Of The Next Decade Could Be Here-13 January 2021
18. Is This The Most Exciting Oil Play Of The Decade?-08 January 2021
19. How To Play The Oil Price Rebound In 2021-05 January 2021
20. Could This Be The Top Oil Play For 2021?-21 December 2020
21. 2 Ways To Win Big On The Oil Price Rebound-16 December 2020
22. Is This The Most Exciting Oil Stock For 2021?-18 November 2020

23. The World's Last Major Onshore Oil Play?-06 October 2020
24. Two Ways To Win Big On The Oil Price Rebound-23 September 2020
25. The Biggest Oil Discovery Of The Year Could Happen Here-24 August 2020
26. 3 Ways To Play The Coming Oil Boom-18 August 2020
27. Supermajors Are Flocking To This Booming Oil Frontier-30 June 2020

APPENDIX “D” – Unlawful Stockhouse Statements

A. The July 23, 2020 Stockhouse Post

13. On July 23, 2020, Hindenburg Research published a critical report about Facedrive, a company whose stock Stafford was hired to promote.

14. Later that evening, Stafford and the other Defendants conspired to anonymously publish a post titled “The Real Story on Moez Kassam and Anson Funds – Part 1” on Stockhouse on July 23, 2020, under the pseudonym “JusinTime”:



15. The July 23 Stockhouse Post called Kassam a “criminal” and included statements accusing him of engaging in illegal, unethical, and “corrupt” business practices as well as egregious personal attacks, which were intended to damage his reputation and turn investors away from him. The accusations are false and defamatory.

16. The July 23 Stockhouse Post accused Kassam of being “corrupt and criminal” and asserted that his practices included “treading on people, lying and using every trick in the book to bring companies down that he bet against” (emphasis added below):

So here is the beginning part of the tale about the corrupt and criminal CIO at Anson funds?
A few short years ago Moez Kassam was a high flying star in the hedge fund space. He had \$1 billion under management (now down to \$250 million and falling) and was the praise of the financial community. But what people don't know is that his media praise was paid for (like when Toronto Life covered his wedding – paid for and made to look like an editorial - shame). But even worse he made his money the dirty way, treading on people, lying and using every trick in the book to bring companies down that he bet against. Whatever it took, whoever he ruined financially or reputation wise he would do it to turn a profit.

17. In particular, the July 23 Stockhouse Post discussed Anson's investment in the cannabis company Tilray Inc. ("**Tilray**"). The post falsely asserted that, during this period, Anson had "a large naked short position" which posed a "significant credit risk" to its creditors, and that Anson committed "numerous securit[ies] violations [in] ever f[l]avour imaginable" in order to protect its solvency.

18. The July 23 Stockhouse Post also falsely stated that Anson was "again caught naked" in relation to Facedrive, falsely implying that Anson's conduct was abusive or illegal and asking IIROC if it would be investigating "how Moez creates paper". Anson does not engage in naked short selling.

19. The July 23 Stockhouse Post stated that the Plaintiffs were "bad actors" who are "getting away with" "huge regulatory infringements", and that there were "zero repercussions for their illegal behaviour."

20. The July 23 Stockhouse Post claimed that further allegations of "corruption, lies and foul play" against the Plaintiffs were forthcoming, and concluded with, "Stay tuned especially IIROC, juicy bits coming for you folks."

21. Jacob, who maintains a Twitter account through an alter-ego named "John Murphy" with the username @JohnMur67039142, tweeted a link to the Stockhouse July Post ***on the day it was published:***



The timing demonstrates insider knowledge that the July 23 Stockhouse Post was being published.

22. Shortly after the publication of the July 23 Stockhouse Post, “John Murphy” issued tweets alleging that the Plaintiffs had a short position in Facedrive and predicting that “much more will come out on this trade”. For example:



23. “John Murphy” included the Twitter accounts of The Globe and Mail and its reporter David Milstead, as well as BNN Bloomberg, in this tweet in order to draw these allegations to the media’s attention.

B. The August 14, 2020 Stockhouse Post

24. The Defendants conspired to publish a further defamatory and anonymous post on Stockhouse on August 14, 2020 titled “Moez Kassam and Anson Funds – Short \$500 M and Lose It All” under the pseudonym “evtrader”:



25. This post was published using an IP address originating in Mexico City, where multiple www.OilPrice.com employees are located. It made similar allegations to the July 23 Stockhouse Post.

26. The August 14 Stockhouse Post continued the egregious and baseless personal attacks against Kassam, referring to him disparagingly as an “awful little grot” and falsely stating that the Plaintiffs “lost \$500 million on a Tilray short”.

27. The August 14 Stockhouse Post also stated that “regulatory fire...will be coming [Kassam’s] way soon.” This was one of several attempts to draw regulatory attention to Anson, and falsely imply that the Plaintiffs were engaged in behavior that violated securities regulations.

28. Also on August 14, 2020, “John Murphy” retweeted the false claim that Anson was behind the report produced by Hindenburg Research (“**Aphria Hindenburg Report**”) regarding Aphria, a cannabis company, and predicted that the “story will be all over the streets within months”. This tweet included a photo of Kassam that later appeared in the

Defamatory Manifesto, and also included the Twitter account of BNN Bloomberg to draw the allegations to its attention. The tweet read as follows:



29. The same day, “John Murphy” tweeted additional allegations that Kassam paid for critical reports regarding Facedrive, Aphria, Tilray and other stocks:

\$FD #moezkassam paid for negative promotions on \$FD [Facedrive Inc.] \$apha [Aphria] \$tlry [Tilray] and many more. Was this disclosed by publisher? @AnsonGroupFunds @HindenburgRes @BNN Bloomberg @BettingBruiser \$tlry \$apha \$shortsellers @IIROCinfo

C. The August 17, 2020 Stockhouse Post

30. The Defendants conspired to continue their scheme to harm the Plaintiffs by anonymously publishing a post on Stockhouse on August 17, 2020 titled “The Real Story on what happened with Moez Kassam and Aphria”, under the pseudonym “Bundyj”. This

post was published using an IP address originating in Toluca, a suburb of Mexico City, where www.OilPrice.com has multiple employees:



31. The August 17 Stockhouse Post alleged that Kassam is “a ***corporate sociopath*** of the worst kind...He talks the talk and ***worms his way into friendships that he fully plans to betray*** for a dollar at the first opportunity.”

32. The August 17 Stockhouse Post alleged that Anson had invested in Aphria, but that following Anson’s “failed short campaign against Tilray”, the Plaintiffs “became desperate” and “***decided to betray [Kassam’s] friends and colleagues at Aphria.***”

33. The August 17 Stockhouse Post falsely stated that the Plaintiffs commissioned the Aphria Hindenburg Report to publish negative material regarding Aphria, and that the Plaintiffs provided Anderson with “sensitive, insider information that [Kassam] obtained from his friendships with Aphria management and founders”.

34. The August 17 Stockhouse Post also falsely claimed that, shortly before the Aphria Hindenburg Report was released, the Plaintiffs took a short position in Aphria so that they could profit from the diminution of its stock price. Aphria’s stock fell following the release of the report, and the post claimed that, “to the outside world Kassam feigned shock...to avoid suspicion even though he had orchestrated the entire scheme and illegally fed Nate insider information.”

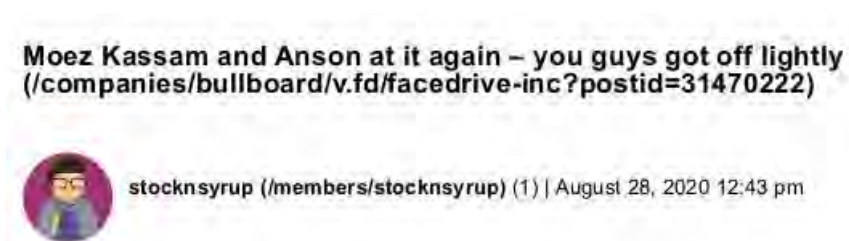
35. The August 17 Stockhouse Post implied Anson's conduct violated securities regulations by encouraging regulators to investigate the allegations it contained. It concluded by encouraging readers to "[c]opy and share as I'm sure Moez will try to have this post removed."

36. Shortly after the August 17 Stockhouse Post was published, Anson received an anonymous telephone call at its offices threatening harm to Anson and Kassam.

37. On August 21, 2020, Robert texted Spektor about Puri, commenting: "When I see Sunny...I'm punching his ticket...I've chased sunny now twice now...Ran like a bitch". In the same conversation, he implied that he could have physical harm done to Kassam: "I'm well connected also ... ***if I wanted someone to visit Moez I could [have] had it done already*** but just moved past it and it's his loss now".

D. The August 28, 2020 Stockhouse Post

38. The Defendants conspired to anonymously publish a post on Stockhouse on August 28, 2020 titled "Moez Kassam and Anson at it again – you guys got off lightly", under the pseudonym "stocknsyrup". This post was published using an IP address originating in Mexico City, where www.OilPrice.com has multiple employees (and in fact, the IP address that published this post is the same as the one that published the August 14 Stockhouse Post):



39. The August 28 Stockhouse Post alleged that Anson invested in Zenabis and appointed a “**stooge**”, Adam Spears, to Zenabis’ board. Among other things, it falsely and maliciously asserted that Anson used Spears to “convince...Zenabis to do all sorts of things that were hugely detrimental to the company and geared towards its destruction”.

40. The August 28 Stockhouse Post falsely stated that Spears was “feeding Kassam insider information so Kassam could better time the short sells and make even more money. YES, THIS IS ILLEGAL!”.

41. The August 28 Stockhouse Post asserted that the “coup de grace” for Zenabis was Kassam and Spears convincing it to pursue an initial public offering at an overvalued valuation so that, due to Anson’s short position, Kassam would have “a massive win” when Zenabis’ share price fell. It claimed that the Plaintiffs “made a fortune on this” scheme. The post falsely asserted that the Plaintiffs’ conduct “**completely destroyed Zenabis and its shareholders, and it was illegal every step of the way**”, and encouraged regulators to investigate.

APPENDIX “E” - The Defamatory Manifesto

A. Planning the Defamatory Manifesto

42. During meetings and/or conversations to plan the Defamatory Manifesto, Rudensky told Stafford and Robert the following, among other things, establishing that he was involved with the Defamatory Manifesto:

[Rudensky, Transcript #3]: ...But I've been on the street for 15 years and Moez seems like a guy who would have dinner with you and shake your hand and then screw you over and I don't get how he survives...

[...]

[Rudensky, Transcript #3]: ...I was a broker and G&P [i.e. Richardson GMP] for over 10 years [Rudensky worked at Richardson GMP from November 2009 until September 2015 when he left, as described in the statement of claim at paragraphs 17-18]...

[...]

[Rudensky, Transcript #3]: ...In 2018? I left in 2015 and he [Adam Spears] had come in and said his goodbyes a year earlier [Rudensky left Richardson GMP in 2015] ...

[...]

[Rudensky, Transcript #3]: ...Nothing else from me right now. I think we are on the same page, this is reinforcing some of the stuff I've heard.

43. During other meetings and/or conversations to plan the Defamatory Manifesto, Robert and Stafford had, among other things, the following discussions as Stafford asked Robert to draft false and defamatory allegations against the Plaintiffs:

[Stafford, Transcript #4]: OK – so do you have any paper or anything? Everything you've given me is great for a story but it won't take [Kassam] down. So I need something...

[...]

[Stafford, Transcript #4]: ...Interesting, I like that, it's interesting. You know this better than me? Can you write out that whole process start to finish?

[Robert replies, Transcript #4]: Sure – I'll do that example. I can do it on Sunday but that is just one case in the US. ...

[...]

[Stafford, Transcript #4]: ...Ok – can you write something out....

44. During other meetings and/or conversations to plan the Defamatory Manifesto, including several of the meetings described herein, Stafford, Rudensky and/or Robert made, among others, the following statements as they sought to conspire against the Plaintiffs:

[Robert, Transcript #1]: ...The regulators are on to [Kassam] and I know the dirt but you'd have to offer something substantial for me to start digging into Moez. I hate the guy, but I'd have to go out of my way....

[...]

[Robert, Transcript #1]: ...We can hurt him [Kassam] with the regulators and definitely find more info on his funds and who he works with? I ran into Sunny Puri twice and nearly punched him out...

[...]

[Robert, Transcript #2]: ...I'll go through all of this with your investigator...

[...]

[Stafford, Transcript #3]: ...What if we were to put pressure on the banks and brokerages? Credit compliance etc. Then they would take a closer look at their [Anson's] operations...

[...]

[Stafford, Transcript #3]: ...If you were to do surveillance on him [Kassam], where would you look?...

[...]

[Stafford, Transcript #3]: ...We need to make him [Kassam] toxic to force the regulators...

[...]

[Rudensky, Transcript #3]: ...What we need to do is up the pressure on the brokers...

[...]

[Robert, Transcript #3]: ...I'm going to keep talking, but with COVID it's hard to bump into people. But the way we hurt this guy [Kassam] is by doing a report and getting the regulators to look at it...

45. During other meetings and/or conversations to plan the Defamatory Manifesto, including several of the meetings described herein, Robert implied that Stafford was paid by Facedrive and that Stafford had an animus against the Plaintiffs:

[Robert, Transcript #1]: ...So Moez was panicking and bringing up your name [Stafford] and oilprice and the fact you got \$8 million to promote [Facedrive]. Which is a number I heard a long time ago...

[...]

[Robert, Transcript #2]: ...You're [Stafford] not the first person he's [Moez] pissed off...

[...]

[Robert, Transcript #3]: ...You have that with Facedrive, it hit 500 million and [Kassam] shorted it and you guys [Stafford and www.OilPrice.com] ran it to 1-2 billion...

46. During other meetings and/or conversations to plan the Defamatory Manifesto, including several of the meetings described herein, Robert and Stafford made, among other things, the following statements about Rudensky's employer Andy Defrancesco:

[Stafford, Transcript #2]: ...Has [Kassam] screwed other people over apart from Andy?...

[...]

[Stafford, Transcript #3]: ...Is there anything we can do to help Andy or is he just screwed?...

[...]

[Robert, Transcript #3]: ...Everybody got mad and nobody wanted to touch Andy and it was all Moez...

47. During other meetings and/or conversations to plan the Defamatory Manifesto, including several of the meetings described herein, Robert claimed to have involvement behind critical research findings that were published about publicly traded companies:

[Robert, Transcript #1]: So here's my conundrum here. I do hate Moez but I am friends with Nate [Hindenburg Research] and I gave feedback on his [Facedrive] report and helped with it. I didn't know you at this time or who was on the other side of this trade...And I've helped Nate [Nathan Anderson of Hindenburg Research] on these reports before. So Andy called me last night and I couldn't say much because I didn't want to burn my relationship with Nate either...

[...]

[Robert, Transcript #1]: ...We [referring to Robert and Nathan Anderson of Hindenburg Research] did a short called Aphria with Andy...

B. Summary of the Defamatory Manifesto

48. From its first paragraph, the Defamatory Manifesto accuses the Plaintiffs of engaging in criminal and unethical conduct (emphasis added):

Never has there been a bigger scourge of the Canadian capital markets. Moez Kassam and his Anson Funds have systematically engaged in capital market crimes, including insider trading and fraud, to rob North American shareholders of countless millions. In his attempt to destroy small-cap Canadian companies through nefarious means, a string of feeder funds and untraceable payments to elude regulators, Moez Kassam has betrayed even his closest friends. Now, the other shoe is about to drop as Kassam's funds run out and a string of failed attempts at illegal destruction leave this naked short seller truly naked.

49. The Defamatory Manifesto labels Kassam the “Toad of Bay Street”, with a large photograph of a toad, and advises readers to “steer clear” from Kassam’s ***“illegal activities.”***

50. The Defamatory Manifesto makes clear that its purpose is to paint Kassam as “the symbol of everything that is wrong with capital markets” and that with the “help” of “Kassam’s acquaintances [who] have flipped amid all the betrayal,” a “team of investigators is following all the threads of the ***questionable and illegal activities Kassam has pursued in an attempt to make money by destroying small companies and the lives of anyone who happened to get in his way:*** even those who helped him and ended up being disposable.”

51. The Defamatory Manifesto falsely implies that the Plaintiffs have violated securities regulations. It improperly and maliciously encourages regulators, such as the OSC, SEC and IIROC, to investigate the Plaintiffs and implores them to “Pay Close Attention” to ***“high-functioning sociopath”*** Kassam. It claims that Kassam is “pinging [the] regulatory radar quite loudly” and that, in addition to Canadian regulatory scrutiny, the Plaintiffs’

“[d]irty deals in the U.S. are going to haunt [Kassam] as well—and the SEC has razor-sharp teeth.”

52. The Defamatory Manifesto gives the false impression that the Plaintiffs were already under regulatory investigation. Later modified versions of the Defamatory Manifesto state at the outset: “IMPORTANT UPDATE: **OSC and IIROC are now aware of Anson’s illegal market activities** and are asking the public for information. The regulators need your help. If you have information for them or have been hurt because of their actions please get in touch... Do not be silent – help them clean up the capital markets”. This part of the Defamatory Manifesto includes a link to an OSC media release that has no known connection to Anson, in an attempt to lend further credibility to the false notion that the Plaintiffs are under investigation.

53. The Defamatory Manifesto implies falsely that the Plaintiffs engaged in “naked short selling” by stating that they were the “primary inspiration” of a forthcoming bill to prohibit “naked short selling in Canada.”

54. The Defamatory Manifesto calls the Plaintiffs’ fully legal short-selling strategy “**illegal**” and claims that Kassam has “**lost friends...almost all of whom he betrayed in underhanded and illegal short-selling schemes**, including the best man at his wedding whom he threw under a speeding short-selling bus”.

55. While this allegation is false, Robert is one of the few individuals who has information about the relationship between Kassam and his best man, Allen Spektor, who introduced Kassam to Robert. During meetings and/or conversations to plan the

Defamatory Manifesto, Robert told Stafford and Rudensky the following, among other things:

[Robert, transcript #3]: [Kassam] is a piece of shit. He befriends people, uses people. I just spoke to the best man [Allen Spektor] at his wedding and they don't talk about shorting anymore because he just feeds everyone shit. This is his best friend. They don't talk about short selling because it ruins the friendship...

[...]

[Robert, transcript #3]: He's a big guy, he [Allen Spektor] was his best man. And he [Spektor] introduced me to Moez a long time ago and promised me the world if I helped this guy, and none of them came true. This Alan [Spektor] guy has recommended so many people that Moez fucked over that he doesn't involve himself in the circle anymore. I gave him a hard time.

56. The Defamatory Manifesto claims that “Moez Kassam’s MO” and the Plaintiffs’ general investment strategy is to invest in small companies in need of cash to “buy influence”; purposefully place the company “into a vulnerable position” in order to drive down its share price; and then short-sell the company’s shares “by a far greater amount” than their initial investment. It falsely asserts that “[p]rivate placement money coming from Moez Kassam is toxic money that comes with self-destructing strings attached.”

57. Under the heading “**How Moez Kassam Cheated Zenabis**”, the Defamatory Manifesto falsely accuses Kassam of engaging in a “game” in which he took a “visible long position” in Zenabis and a “much larger (10x) secret short position” to cause Zenabis’ share price to go down. It falsely states that Kassam effectuated his scheme by placing “a figurehead as the director of [the] company” – Adam Spears – and convincing him to go public at “the highest possible valuation” to “set up a massive downside potential for Kassam to make a killing shorting” its shares. The Defamatory Manifesto also alleges

falsely that Spears “fed” Kassam material non-public information that the Plaintiffs then leaked to the public, and which the Plaintiffs also used to time short sales advantageously. The Defamatory Manifesto claims that the Plaintiffs replaced Zenabis’ CEO after he discovered the “scheme”, and installed a new CEO whom they convinced “to dig his own grave” because they “were in control” of Zenabis “through their **stooge, Adam Spears**”. The Defamatory Manifesto asserts that the Plaintiffs’ “dirty short selling strategies” had “completely destroyed Zenabis, taking it from a \$950-million market cap company all the way down to around \$50 million over dinner and drinks.”

58. These are false allegations that Robert had previously made using the “Betting Bruiser” Twitter account, prior to the Defamatory Manifesto being published. These allegations were also included in the Unlawful Stockhouse Statements.

59. The Defamatory Manifesto continues with respect to Aphria. It falsely accuses Kassam of being “the mastermind” behind the Aphria Hindenburg Report by using Puri – who it says “makes bottom feeders look appealing” and did all the “dirty legwork”– to “illegally feed” its author Nate Anderson “sensitive, insider information that he obtained from his friendships with Aphria management and founders – sprinkled with exaggerated lies”. The Defamatory Manifesto asserts that the Plaintiffs were “a large holder of Aphria stock” and short sold shares immediately before release of the Aphria Hindenburg Report, which “irreparably damaged” and “crashed Aphria stock”. The Defamatory Manifesto claims that Kassam “**betrayed**” his “friends” and then “feigned shock...to avoid suspicion even though he had **orchestrated the entire scheme and illegally fed Nate [Anderson of Hindenburg Research] insider information.**”

60. The Unlawful Stockhouse Statements contained the same allegations regarding the Plaintiffs and Aphria, as did the “John Murphy” tweets from before the Defamatory Manifesto was published.

61. The Defamatory Manifesto falsely alleges that the Plaintiffs engaged in a similar scheme with Genius Brands International, Inc. (“**Genius**”), a children’s entertainment company. It falsely states that Plaintiffs engineered a “pump and dump” scheme whereby they raised Genius’ share price by commissioning favourable reports from “pumpers” on social media, and then took “significant short positions” immediately prior to the release of a negative report that they commissioned Nate Anderson of Hindenburg Research to write. The Defamatory Manifesto also falsely claims that Kassam had provided vetted “insider” information to Anderson to assist with writing that report. The Defamatory Manifesto’s allegations regarding Genius maliciously conclude by implying the Plaintiffs violated securities regulations: “The Toad of Bay Street—dipping his webbed feet precariously into SEC waters—rode [Genius] all the way up and then shorted it all the way down—disgusting.”

62. The Defamatory Manifesto falsely accuses the Plaintiffs of engaging in a similar illegal scheme with Facedrive, a company Stafford was paid to promote and of which he owned a significant number of shares. It falsely states that Plaintiffs took “a huge naked short” position in Facedrive, “panicked,” and in order to drive down its share price, commissioned Anderson of Hindenburg Research to publish a negative report regarding Facedrive. The Defamatory Manifesto claims, falsely, that Kassam told others about the report “days before it went out”, which it characterized as “insider trading”. The Defamatory Manifesto claims that the report “failed to generate the negative action

[Kassam] needed to avoid losing what remains of his fund” and that he “lied to the banks” regarding his Facedrive investment. It warns that Facedrive should “be prepared for another assault out of desperation” because the Plaintiffs are “desperately trying to drive this stock lower”. It states that Plaintiffs would publish a further negative report from researcher “The Friendly Bear”, which the Defamatory Manifesto falsely states was a pseudonym for Kassam and Puri. It also alleges that the Plaintiffs’ banks were helping them with this “illegal” scheme. The Defamatory Manifesto alleges that Anson and Kassam were behind “The Friendly Bear” research report regarding Facedrive – an allegation that is clearly false since no such report exists.

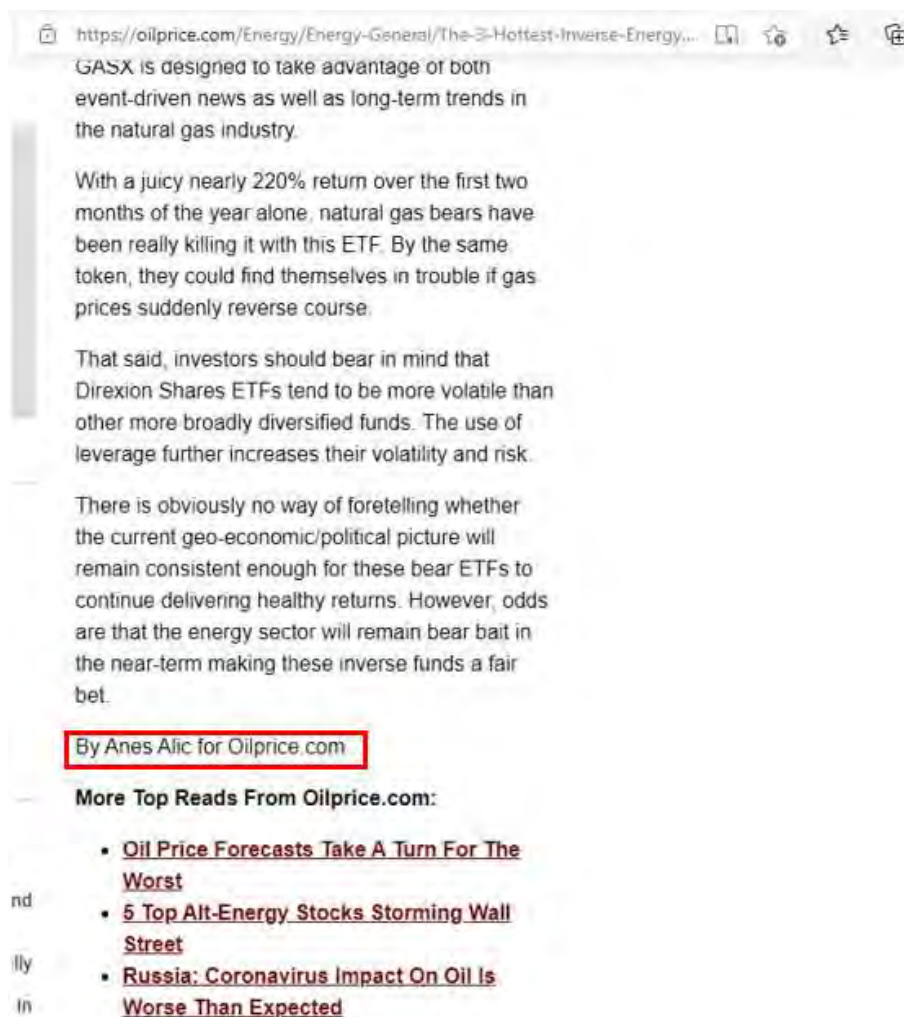
63. As referenced herein, “John Murphy” had previously made similar false assertions about the Plaintiffs and Facedrive. “Betting Bruiser” had also previously tweeted the allegation that the Plaintiffs controlled the Friendly Bear, before the Defamatory Manifesto was published.

64. The Defamatory Manifesto falsely alleges that Tilray had “been the victim of an Anson Funds scheme (which failed)”, and that Anson’s “disastrous attempt to short much larger Tilray” caused “a liquidity crisis” for Anson, which lost hundreds of millions of dollars “in the scheme”. The Defamatory Manifesto further alleges that, having “lost around \$80 million on this dodgy short strategy”, Kassam “nearly lost everything” and had to “grovel” to raise capital for Anson.

65. The Defamatory Manifesto falsely alleges that Anson underpays or “stiffs” people. Robert has made similar allegations that he was not compensated for past due diligence he shared with Anson using the “Betting Bruiser” Twitter account.

C. The Defendants' Attempt to Conceal their Identities and Disseminate the Defamatory Manifesto

66. The Defendants or their proxies communicated with the Bosnian developers using anonymous email addresses to conceal their identities, including from the developers themselves. The email addresses used by the Defendants were editormarketinvestigations@protonmail.ch and anesalic@protonmail.com. "Anes Alic", the name used in one of these email addresses, is a "journalist" for Stafford's website www.OilPrice.com, and the emails sent by anesalic@protonmail.com to the developers were sent either by Stafford or at his behest:



67. The Defendants provided the developers with the text of the Defamatory Manifesto, and the developers created the websites on which it was posted using WordPress. The Defendants paid the developers US\$100 for this work. The Defendants instructed the developers to delete all of their email correspondence following the completion of this work in an attempt to conceal their identities (although the developers did not, in fact, delete all such emails).

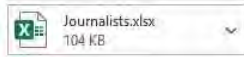
68. Stafford and the other Defendants compiled a spreadsheet containing the names and email addresses of 2,854 journalists, news editors, and others in the business community to whom they planned to disseminate the Defamatory Manifesto. Stafford had these names and contact information in his purported capacity as a “journalist”. He and the other Defendants – seeking to imbue the Defamatory Manifesto with a false sense of credibility – intended that these journalists and news editors would re-publish the allegations against the Plaintiffs in their respective news outlets. The spreadsheet’s metadata indicates that the spreadsheet’s author was “James Stafford”, and that the spreadsheet was created on September 30, 2020 and last edited October 1, 2020 — just days after the Defamatory Manifesto was first published:



69. The first four entries on the spreadsheet are pictured below. The first entry is for “James”, with the email “admin@oilprice.com”. Stafford operates the stock promotion website www.OilPrice.com. The second entry is for “Jim”, with the email address “james@floatingmix.com”, another email address associated with Stafford (and the domain “floatingmix.com” is registered to Advanced Media Solutions, the parent of www.OilPrice.com). The third and fourth entries are for “Jimbo” and “JS” at “capitalmarketsinvestigation@protonmail.com” and “info@stockmanipulators.com”. Both email addresses were used as “tiplines” for different versions of the Defamatory Manifesto:

	A	B
1	James	admin@oilprice.com
2	Jim	james@floatingmix.com
3	Jimbo	capitalmarketsinvestigation@protonmail.com
4	JS	info@stockmanipulators.com

70. Stafford and/or the other Defendants, using the email address “anesalic@protonmail.com”, sent this spreadsheet to the developers hired to assist with disseminating the Defamatory Manifesto:



Sent from ProtonMail mobile

----- Original Message -----

On 4. okt 2020. 23:17, anesalic <anesalic@protonmail.com> wrote:

Sent with [ProtonMail](#) Secure Email.

----- Original Message -----

On Sunday, October 4, 2020 10:44 AM, editormarketinvestigations <editormarketinvestigations@protonmail.ch> wrote:

Sent with [ProtonMail](#) Secure Email.

71. One version of the Defamatory Manifesto used the email address cokiga@protonmail.com as the “tipline”:



72. One of the “journalists” at www.OilPrice.com is named “Cokiga” Damke:



D. The Unsolicited Emails

73. The Unsolicited Emails sharing the Defamatory Manifesto contained further Unlawful Statements against the Plaintiffs. One version of the email included the following (emphasis added):

This is a huge developing story on insider trading, market manipulation and fraud within America and Canada's capital markets that I thought you might be interested in.

Anson Funds and Moez Kassam have been destroying companies through illegal means and their partners are some of the largest banks in the world.

The below investigative report looks at which banks are involved and how the fraud has taken place. A lot of very powerful people are going to find themselves under fire....

From what I have been led to believe Anson Funds have sponsored a huge DDOS attack against the various sites that hosted the article and they have all gone down now.

The report obviously has these crooks very concerned and they are desperate no one reads the report. So we can now add cyber crimes to Anson's list of wrongs as well.

74. Another version of the Unsolicited Emails stated the following:

We have a new tip for you that involves the almost unbelievable activities of a hedge fund based in the U.S. and Canada that has broken countless laws and because of their actions have taken billions from ordinary investors and destroyed a huge number of companies.

Please take a moment to read this piece: [link to "MarketCrimes.to".]

You might have heard rumours about it – but it has been going up and down due to huge DDOS attacks from the hedge fund in question who do not want this information getting out.

A second part will be coming soon but this really is a story that needs to see the light of day and I'm hoping you can share this piece with as many people as possible.

75. These Unsolicited Emails were designed and intended to further harm the Plaintiffs and damage their reputation in the financial industry.

E. Further Attempts to Disseminate the Defamatory Manifesto on Twitter

76. On September 28, 2020 – the day after the Defamatory Manifesto was first published – Robert texted Spektor (the contact who introduced him to Anson) the following in reference to the Defamatory Manifesto (emphasis added):

I knew it was coming...

I know who wrote...

Moez likely going [to] sue

77. On September 29, 2020, “Betting Bruiser” tweeted a link to the Defamatory Manifesto, commenting:



78. On September 29, 2020, shortly after Anson was able to have the Defamatory Manifesto taken down from www.MoezKassam.com, Jacob quickly tweeted a new link to the Defamatory Manifesto on a different website, www.StockManipulators.com – again showing the Doxtators’ involvement in the Defamatory Manifesto. He again included the Twitter accounts of the Globe and Mail, and reporter David Milstead, in his tweet:



79. On September 29, 2020 “John Murphy” also tweeted:

big difference from shorting a fraud and paying for a short report calling a company a fraud to try and fix your trade. bad companies need to be taken down. big difference between the two. anson does both! [sic]

80. On September 30, 2020, Robert referenced the Defamatory Manifesto in a “Betting Bruiser” tweet to advance his allegation that he was unpaid for certain due diligence:

Something that was wrong about the Anson and Moez article circulating was the allegation that Moez/Anson compensates people to write reports. They just use people and don’t pay anyone but themselves. \$ZENA \$APHA #PotStocks

81. On September 30, 2020, in response to an Anson press release denouncing the Unlawful Statements, “John Murphy” commented:

Anson and Moez put out this response. it fails to address the allegations outlined. when they question a company they ask for a line by line response. we are waiting @MunchingMoez ansonfunds.com/wp-content/upl... @QTRResearch @BettingBruiser @LamboJohnny @weedstreet420 @davidmilstead

82. During this time, “John Murphy” re-tweeted several tweets publishing links to the Defamatory Manifesto. He also re-tweeted several of Robert’s tweets about the Plaintiffs, as well as those of other Twitter users sharing and discussing the Defamatory Manifesto,

reflecting the Defendants' concerted and coordinated effort to defame the Plaintiffs. He also repeated false allegations of a DDOS attack by Anson, in replying to a tweet by "Betting Bruiser" that contained a link to the Defamatory Manifesto with the following false allegation:

sounds like #moez attacked the site where the @AnsonGroupFunds report was profiled. a very expensive DDOS attack to prevent the public from seeing the piece. Investors in the fund probably have plenty of questions for @MunchingMoez @davidmilstead \$apha \$fd \$gfl \$shrm many more

F. "Betting Bruiser" Tweets

83. The tweets published by "Betting Bruiser" shortly after the Whatsapp exchange between Kassam and Robert included the following:

- (a) "One thing that was left out of the \$ZENA [Zenabis] and Anson Funds report was [the] fact that Anson's funds legal counsel (Laura Salvatori) husband (Muneeb Yusuf) via Brownstone Advisors facilitated the toxic financing deal between \$ZENA & \$TLRY [Tilray] ... conflict of interest much? #Potstocks";
- (b) "Hi Laura [Salvatori, Anson's legal counsel] [Hand waving emoji] ... cause I know you follow every tweet I speak about Anson ... I thought I'd give you a shoutout! \$ZENA \$TLRY #PotStocks";
- (c) "If you r an Anson Funds investor ... be prepared to have your funds locked up b/c there is a lot [of] information floating out there that paints a picture of scams to benefit none other then [sic] Moez Kassam. \$ZENA story is just one of hundreds were its [sic] alleged he broke the law. #PotStocks";

- (d) “Maybe I should speak to regulators about Anson Funds and collect the reward in 50 years Or should I just leak snippets of recorded conversations with Moez Kassam? Thoughts? #PotStocks”; and
- (e) “I think I’m going [to] release some of the recordings about Moez Kassam ... just interested how much money Anson pays Ben Axler from @sprucepointcap ... you care to comment Ben?”

84. The tweet described immediately above was accompanied by a purported transcript of a recent conversation between Kassam and Robert. In fact, the conversation that was transcribed occurred several years ago and the tweet was misleading. This was another attempt by Robert to deceive his Twitter followers and defame the Plaintiffs.

85. On October 9, 2020 — the Friday before Thanksgiving weekend — “Betting Bruiser” wished death on Kassam:



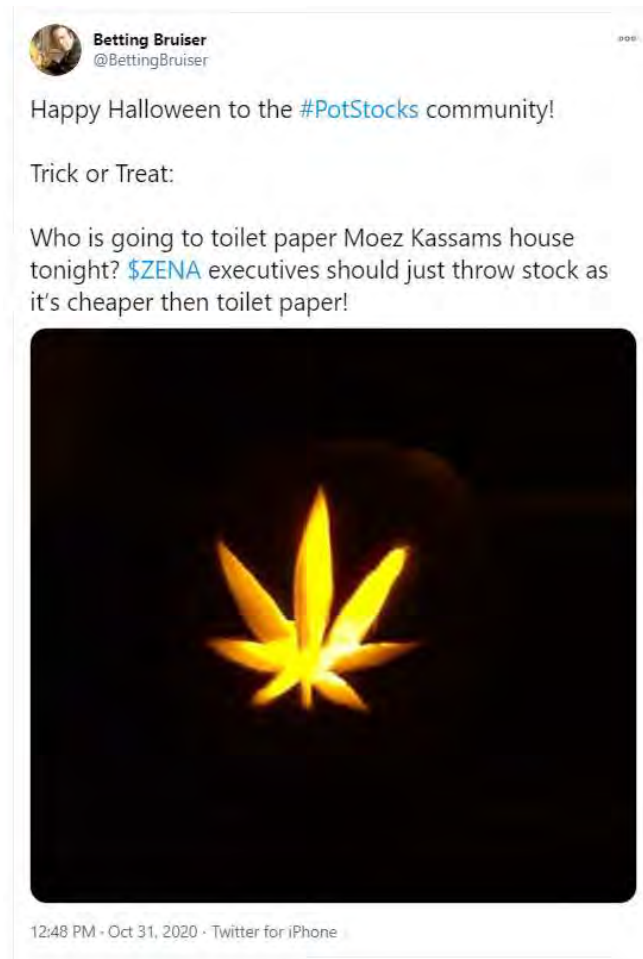
86. On October 29, 2020, shortly after the Defamatory Manifesto was republished on www.MarketCrimes.to, “John Murphy” tweeted a link to the new website, and included in the tweet the Twitter accounts of BNN Bloomberg and Jeff Kehoe, the Director of

Enforcement for the OSC, to bring the Defamatory Manifesto to their attention and attempt to cause the maximum harm to the Plaintiffs.

87. On October 30, 2020, “Betting Bruiser” posted further Unlawful Statements regarding Anson and Kassam:

- (a) he posted a recording of part of a recent conversation between Robert and Kassam regarding the Conspiracy, with the following comment: “This is Moez Kassam from Anson Funds in the flesh running scared from recent reports about his tactics. Worth a listen. This guy is the scum of the earth”; and
- (b) “He doesn’t have anyone but the scum Sunny Puri, the Globe & Mail and other short sellers doing his dirty work for him. Including paying @sprucepointcap @CitronResearch @FriendlyBearSA and others ... why did you block me Ben Adler ... is it the fact your Moez Kassam lapdog?”

88. On October 31, 2020, “Betting Bruiser” posted a tweet encouraging vandalism of Kassam’s house:



G. Messages Publicizing the Defamatory Manifesto

89. The Defendants and/or their proxies shared links to the Defamatory Manifesto on Yahoo Finance with the comments including the following:

- (a) a user named “America” commented, “Will the Canadian regulators do something? I cannot believe someone has been able to get away with this for so long”;

- (b) a user named “Antti” commented, “Canadian hedge fund under fire for illegal practices[.] Looks like Anson have managed to take those sites down – they don’t want the world to know about their crimes”;
- (c) a user named “Alissa” published several messages sharing the Defamatory Manifesto, commenting, “This is everything that’s wrong with the stock market... Looks like a big scandal might be unfolding”, “Have anyone else seen this??? Bomb report on Moez Kassam and Anson Funds. About time ... Clean up what’s truly dirty and rotten to the core” and “Interesting investigative piece looking at a short selling group that have scammed investors out of billions. It’s a must read”; and
- (d) a user named “Daniela” commented, “Seems like a scandal might be starting in the Canadian markets[.] Take a look at this article I found on another community about this hedge fund guy that has been running amok in the Canadian markets – crazy...”.

90. Posts published on Stockhouse in September and October 2020 included the following:

- (a) on September 29, 2020, a user named “KhalidZ” shared a link to the Defamatory Manifesto with comments almost identical to those of “Daniela”, described above: “A scandal might be starting to unfold in the Canadian market[.] Take a look at this article I found on another community about this hedge fund guy that has been running amok in the Canadian markets –

crazy...”. This post published using the VPN “Digital Ocean”, a provider of personal VPN services; and

- (b) on October 1, 2020, a user named “HannaJensen” shared a link to the Defamatory Manifesto with comments identical to those published by “Alissa”, described above: “Interesting investigative piece looking at short selling group that have scammed investors out of billions”.

91. The Defendants or their proxies published Further Unlawful Stockhouse Statements in fall 2020, with headline tags including the following:

- (a) “Time’s Up”;
- (b) “Expose on Moez Kassam”;
- (c) “Tale of Corruption”;
- (d) “These short sellers soured the entire cannabis market”;
- (e) “Check out this piece on short selling bandits in Canada”; and
- (f) “A big scandal might be unfolding in Canadian markets.”

92. Many of these posts included links to the Defamatory Manifesto, and many of the Further Unlawful Stockhouse Statements posted in fall 2020 were published using the Digital Ocean VPN.

H. The Stafford Unlawful Stockhouse Statements

93. The Stafford Unlawful Stockhouse Statements, all published under the username “toffraffles”, were as follows. Many of them referred to Facedrive, one of the companies that Stafford was hired to promote and of which he owned a significant number of shares, as set out herein:

Date	Subject	Post
November 18, 2020	Edward is Upset Because Moez Kassam is Losing Money on FD	Poor Edwardoboo – he gets paid per post from Anson Funds and now his paymaster is losing money hand over fist with his Facedrive short. You referenced the Hindenberg report. This as everyone online knows was a paid for hit piece by Anson. Why don't you look at the report on Moez Kassam and Anson Funds that is going around the internet. Find out just who you are working for. Pure scum. Here's the link just in case you haven't read it: [link to Defamatory Manifesto]
November 19, 2020	RE: Watch the basher rhetoric increase....	Edwardoboo will be coming in hard with the bashing. Probably just got off the phone with Sunny and Moez. They will be upping his salary to \$15 per post if he can create multiple bashing profiles. No sweeter taste than short sellers tears.
November 19, 2020	RE:RE:RE: Watch the basher rhetoric increase....	Here he is – Edward's back – yay. More half witted twaddle from the man who couldn't even get a job in a convenience store and instead has to try and pull down companies for the pennies Moez and Anson tosses him. This company is going places my old mucker. Does Microsoft partner with anyone on the street? No – they know what's happening here and so does the market. Your boss is on the wrong side of this one and is going to lose BIG

Date	Subject	Post
February 25, 2021	What an investigation into Facedrive and Shorts would find	<p>Good post on Yahoo Finance – must read for all Facedrive investors: [link]</p> <p>As someone who has been in since the \$10 range I love the shorts here saying they hope for an investigation. What they do not want is an investigation and neither do their partners in crime, TD Bank, CIBC, RBC. They have been facilitating Anson Funds illegal behaviour with spoofing, downticking and wash trading. They have been miss-marking tickets and hiding the true extent of the naked short position Anson Funds has in Facedrive.</p> <p>They have ruined the market through their illegal actions and any investigation WILL expose this. The banks will sweep this under the rug, cut Anson Funds off and try to get the regulators to move on to mask their continuous illegal behavior.</p> <p>Should the stock be here on fundamentals? No of course not – but Anson and the banks have broken the market and this is why we are seeing the big jumps in share price and I imagine we will see even bigger ones in future when they are forced to cover the bulk of their naked short.</p> <p>This will end very badly for the shorts and I for one welcome an investigation into this whole drama. the banks who will be exposed as Anson Funds are just a grubby little predator who spotted an opportunity and got caught. Now they can't get out of it and when the real buy ins happen this could be a textbook case for making naked short selling in Canada illegal with severe penalties</p>

Date	Subject	Post
February 25, 2021	RE:RE:What an investigation into Facedrive and Shorts would find	you have probably it the right way and gotten the borrow. Anson absolutely have not. TD alone are north of 2 million shares naked short and RCB, TD Bank and others aren't far behind. If you play the game fairly like you have then that's all good – but these guys don't plair [sic] fairly which is the real problem. The real naked short is rumoured to be around 8 million shares which is utterly insane and proves the market or regulatory regime in Canada is utterly broken. I can see this being in textbooks in the future for what can happen when hedge funds are allowed to go naked short and it all goes horribly wrong. Another poster on here said that Anson are waiting for a huge lockup to come free trading in March and that insiders will be dumping their stock. What happens if insiders don't dump and instead hold their shares? Anson have been promising the banks they will. We will see but if Anson are wrong this could explode as the banks will not put up with their lies and stalling any longer as the numbers no longer make sense and force them to cover
February 25, 2021	RE:RE:RE:RE:RE: What an investigation into Facedrive and Shorts would find	you are cleay [sic] a paid Anson Funds stooge. Moez only courts press and comes out when he is desperate and he is VERY desperate. Anson had a diabolical January and i have heard Frbruary [sic] is atrocious as well. He needs funds so Bloomberg put out that puff piece. They are going down
March 10, 2021	RE:RE:RE:RE:RE: Medtronics locking up Facedrive stock for another year	Very little short interest. Don't try and play us for mugs. Everyone on the street knows about the HUGE naked short Anson Funds and their syndicate have against Facedrive. It's the talk of Baystreet [sic]. This trade is going to go very badly for the naked shorts.

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT
LP, ANSON INVESTMENTS MASTER FUND LP AND
MOEZ KASSAM
Plaintiffs

-and-
ROBERT LEE DOXTATOR, JACOB DOXTATOR,
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4
AND OTHER PERSONS UNKNOWN
Defendants

Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

Proceeding commenced at Toronto

FRESH AS AMENDED STATEMENT OF CLAIM

DAVIES WARD PHILLIPS & VINEBERG LLP

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Toronto ON M5V 3J7

Matthew Milne-Smith (LSO# 44266P)
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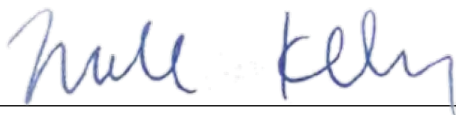
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Lawyers for the Plaintiffs (Defendants to the Counterclaim),
Anson Advisors Inc., Anson Funds Management LP, Anson
Investments Master Fund LP and Moez Kassam

TAB 2C

This is **Exhibit “C”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Julie Kelly", is written over a horizontal line.

A Commissioner for Taking Affidavits
LSO# 84488D

☒ RULE/LA RÈGLE 26.02 (a)

☐ THE ORDER OF _____
L'ORDONNANCE DU
DATED/FAIT LE _____

COURT FILE No.: CV-20-00653410-00CL

.....
REGISTRAR GREFFIER
SUPERIOR COURT OF JUSTICE COUR SUPÉRIEURE DE JUSTICE
ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

B E T W E E N:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP AND MOEZ KASSAM**

Plaintiffs

- and -

**ROBERT LEE DOXTATOR, JACOB DOXTATOR AND JOHN DOE 1, JOHN
DOE 2, JOHN DOE 3, JOHN DOE 4 AND OTHER PERSONS UNKNOWN**

Defendants

-and-

AND B E T W E E N:

ROBERT LEE DOXTATOR

Plaintiff by Counterclaim

-and-

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP, MOEZ KASSAM AND
ALLEN SPEKTOR**

Defendants by Counterclaim

**AMENDED STATEMENT OF DEFENCE AND COUNTERCLAIM OF
ROBERT LEE DOXTATOR**

1. The Defendant, Robert Lee Doxtator (“Robert”), resides in the Province of Ontario.
He is a stock trader who is an active member of the capital markets and a frequent
commenter on important public issues that he and other investors care about. Robert

formerly worked as a cannabis analyst and consultant.

2. Except as expressly admitted herein, Robert either denies or has no knowledge of the allegations in the Statement of Claim. The Plaintiffs are put to the strict proof of the allegations in their pleading. The Plaintiffs knew or were reckless in not investigating and knowing of the matters pleaded herein.
3. Robert pleads and relies on s.137.1 of the *Courts of Justice Act*. He reserves his right to bring a motion under s.137.1(3) at any time in this proceeding. This claim is frivolous, vexatious and an abuse of the process of this Honourable Court. The Plaintiffs knew or ought to have known that when they issued their claim. This proceeding is intended to discourage individuals from expressing themselves on matters of public interest related to the Plaintiffs, their business and their market activities. It will prevent participation in debates on matters of public interest and it is a clear and dangerous misuse of litigation process in Ontario, contrary to the public interest. The Plaintiffs are attempting to stifle Robert's free expression of issues relevant to the integrity of the capital markets in Ontario.
4. Robert is not unique in his claims about Anson Funds. Anson and Kassam have developed for themselves a public reputation and Robert was simply providing his commentary on that. For example, Anson was sued by Catalyst Capital Group in 2017, which accused them of a short selling conspiracy.
5. There was and is no agreement, scheme or conspiracy between Robert and anyone else as described throughout the Statement of Claim related to the matters pleaded. Robert has not engaged in any of the unlawful, tortious or inappropriate behaviour alleged against him.
6. Robert admits that the @BettingBruiser Twitter account belongs to him and admits that the tweets cited in the Statement of Claim were posted on the @BettingBruiser

- account. Robert regularly engages in jestful, satirical, passionate and colourful tweeting, as thousands of other Canadians do every day.
7. Robert did not publish or assist in the preparation of the so-called “Defamatory Manifesto” and puts the plaintiffs to the strict proof thereof. In fact, in one tweet, referenced in Appendix A of the Statement of Claim, Robert corrected a statement in the report, suggesting that he clearly did not write it. Robert discovered this report online and re-posted it on his twitter account, as he was free to do with a document in the public domain.
 8. Robert did not publish any of the alleged defamatory emails or chatroom posts and puts the plaintiffs to the strict proof that these posts and emails are in fact defamatory.
 9. Robert does not know who the unnamed defendants are. He knows Jacob Doxtator (“Jacob”), his young cousin who has filed his own defence in this matter. To Robert’s knowledge, information and belief, Jacob had no involvement with any of the matters in the Statement of Claim.
 10. Robert pleads that the statement of claim is an abuse of process and contains a large number of improper allegations. Robert pleads that the plaintiffs have suffered no further damage to their reputations by the facts they plead and no damage generally.
 11. Robert asks that the action be dismissed with substantial indemnity costs and costs as provided for in s.137.1 of the *Courts of Justice Act*.

COUNTERCLAIM

12. Robert (the Plaintiff by Counterclaim) claims against the Defendants by Counterclaim, for:
 - a. An accounting of trading profits;
 - b. Damages for breach of contract, unlawful conduct conspiracy and fraudulent misrepresentation in the amount of \$2,000,000;

- c. Aggravated damages in the amount of \$1,000,000 or such other amount as this Honourable Court deems just;
- d. Punitive damages in the amount of \$1,000,000 or such other amount as this Honourable Court deems just;
- e. Other damages as may be proven at trial;
- f. Pre and post judgment interest pursuant to the *Courts of Justice Act*;
- g. Costs on a substantial indemnity basis, including applicable taxes; and,
- h. Such further and other relief as this Honourable Court may deem just.

13. Robert repeats and relies upon the facts pleaded in his Statement of Defence herein.

The ~~Plaintiffs~~ defendants by counterclaim Anson and Moez Kassam breached an agreement with Robert

14. Robert was introduced to Moez Kassam (“Kassam”) in October 2018 by Allen Spektor (“Spektor”), a mutual acquaintance who used to work at Anson Funds Management LP. Spektor told Robert he should work with Kassam because Robert had made a reputation for exposing fraud, insider trading, and accounting issues in cannabis companies. Ultimately, Spektor was involved in the conspiracy to refuse payment to Robert, described below.
15. Robert met with Sunny Puri and Kassam. Robert indicated he was a law graduate, but did not hold himself out to be a lawyer. After some negotiation, Robert and Kassam came to an oral agreement that Robert would provide Kassam with due diligence services and Kassam would in turn pay Robert 15% of the profits he made on trades using Robert’s due diligence. Kassam also represented that all of his trades and Anson’s trades were lawful and in full compliance with all securities laws and regulations.
16. During the business relationship, Robert became dismayed with the behaviour of

Kassam and became convinced that Anson was engaging in improper trading, including: short and distort campaigns in an effort to shake investor confidence in specific companies, lower its stock price and increase the value of his short position; insider trading schemes in which select executives and board members supplied Kassam and Sunny Puri with material information from which Anson was able to profit; front running and shorting private placements on insider knowledge from select brokers and executives; stock manipulation using many tactics including bid layering & bid spoofing; providing news media insider information to report on in a negative light under the guise of an anonymous source; involvement in charities in the hope of gathering insider information from others involved in the charity; and more.

17. Kassam refused to pay Robert for his services and Anson and Kassam did not provide relevant information, such as profit & loss statements, so that Robert could not assess what he was owed. Kassam consistently delayed providing this information, telling Robert a series of mistruths, from “the trade didn’t work out” and “it wasn’t profitable” to “it hasn’t closed yet.” Each time Kassam refused to provide payment to Robert, he breached their agreement.

18. On August 17, 2019, frustrated by Kassam’s multiple breaches of their agreement, Robert ended the business relationship. His demands for an accounting and payment have been ignored. The total amount of the damages from Anson and Kassam’s breaches of the agreement are as of yet unknown. After the relationship broke down due to Anson and Kassam’s breaches, Nate Anderson from Hindenburg Research reached out to Robert, saying that Kassam wanted to continue working with him. Robert refused, as Kassam had refused to pay him in the past, and told Nate Anderson that Kassam owed him at least \$100,000 from

a specific short on which Robert had provided due diligence (the “GE due diligence”). Nate Anderson came back to Robert and said that Kassam would pay him for the GE due diligence as a condition of taking the call. Nate Anderson assured Robert that he would be paid. Kassam called Robert on September 20, 2020 and the two men agreed to a payment of \$75,000 for that one trade after some negotiation.

19. Kassam and Robert discussed the so-called Defamatory Manifesto on September 20, 2020. Robert told Kassam he did not write it and Kassam indicated that Robert should “take the fall” for the report and Kassam would pay him the money he owed. In this call, Kassam admitted he knew Robert did not write the report. He wanted to know who did. He proposed that Robert “taking the fall” would provide comfort to Anson investors that Kassam was taking action on the reports. In exchange, Kassam told Robert he could “name his price”.
20. On October 1, 2020, Kassam and Robert had another phone call in which Kassam said he would indemnify Robert if he would take the fall for the report and asked for an invoice for the GE due diligence. Robert said he would not be Kassam’s “fall guy”.
21. Robert submitted his invoice and did not hear from Kassam until October 9, 2020, when Kassam called Robert and threatened his family. No invoices have been paid.
22. Kassam knew that Robert did not write or publish the defamatory material, and yet Kassam and Anson brought this proceeding alleging that he did. Kassam and Anson also leaked Robert’s phone number in the public domain, which led to threatening messages being sent to Robert. This was intended to discourage Robert from expressing himself on matters of public interest related to the ~~Plaintiffs~~ defendants by counterclaim, their business and their market activities.

These instances and other bad faith actions by the ~~Plaintiffs~~ defendants by counterclaim entitle Robert to punitive and aggravated damages.

The defendants by counterclaim caused economic harm to Robert

23. The defendants by counterclaim were engaged in an unlawful conduct conspiracy with the objective of harming Robert economically by taking his due diligence and consistently denying him payment for such service. The defendants by counterclaim acted in combination, that is, in concert, by agreement or with a common design; their conduct was unlawful, with the defendants by counterclaim fraudulently misrepresenting the business relationship Robert would have with Anson and Kassam; their conduct was directed towards Robert; they knew that injury to Robert was likely to result; and their conduct did result in injury, as pleaded above.
24. In the alternative, the defendants by counterclaim fraudulently misrepresented the nature of the arrangement Robert would have with the Anson companies and Kassam when they induced Robert to work with them. By portraying the agreement as an honest business relationship where Robert would be paid for providing a service, Spektor, Kassam and the Anson companies stated false information that they knew was false and intended that such misinformation would cause the deception of Robert. Robert relied on and acted on this misinformation and suffered harm as a result.

April 13, March 25 2021

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by Counterclaim, Anson Advisors Inc.,
Anson Funds Management LP, Anson Investments
Master Fund LP, Moez Kassam, and Allen
Spektor*

Court File No.: CV-20-00653410-00CL

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP,
ANSONINVESTMENTS MASTER FUND LP, MOEZ KASSAM and
ALLEN SPEKTOR**

**ROBERT LEE DOXTATOR, JACOB DOXTATOR AND
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE
4 AND OTHER PERSONS UNKNOWN**

Plaintiffs/Defendants by Counterclaim

and

Defendants/Plaintiff by Counterclaim

**ONTARIO
SUPERIOR COURT OF JUSTICE
Proceeding started in Toronto**

**AMENDED STATEMENT OF DEFENCE AND
COUNTERCLAIM**

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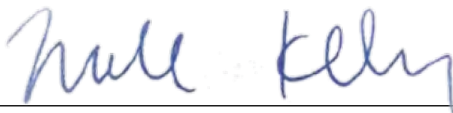
*Lawyer for the Defendants/Plaintiff by Counterclaim,
Robert Lee Doxtator*

TAB 2D

This is **Exhibit "D"** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**

A Commissioner for Taking Affidavits

This is **Exhibit “D”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Julie Kelly", is written over a horizontal line.

A Commissioner for Taking Affidavits
LSO# 84488D

COURT FILE No.: CV-20-00653410-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP AND MOEZ KASSAM**

Plaintiffs

- and -

**JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR,
JACOB DOXTATOR AND JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN
DOE 4 AND OTHER PERSONS UNKNOWN**

Defendants

AMENDED STATEMENT OF DEFENCE OF JACOB DOXTATOR

- 1) The Defendant, Jacob Doxtator (“Jacob”), is 21 years old. He resides in the Province of Ontario. Until recently he worked at a winery in Prince Edward County as a labourer.
- 2) Except as expressly admitted herein, Jacob either denies or has no knowledge of the allegations in the Fresh as Amended Statement of Claim. The Plaintiffs are put to the strict proof of the allegations in their pleading. The Plaintiffs and their lawyers knew or were reckless in not investigating and knowing of the matters pleaded herein.

- 3) Jacob pleads and relies on s.137.1 of the *Courts of Justice Act*. He reserves his right to bring a motion under s.137.1(3) at any time in this proceeding. This claim is frivolous, vexatious and an abuse of the process of this Honourable Court. The Plaintiffs knew or ought to have known that when they issued their claim. This proceeding is intended to discourage individuals from expressing themselves on matters of public interest related to the Plaintiffs; it will prevent participation in debates on matters of public interest and it is a clear and dangerous misuse of litigation process in Ontario, contrary to the public interest. The Plaintiffs are attempting to make an example out of Jacob even though he has not engaged in any of the wrongdoing alleged or speculated about by the Plaintiffs.
- 4) There is no agreement, scheme or conspiracy between Jacob and anyone else as described throughout the Fresh as Amended Statement of Claim related to the matters pleaded. Jacob has not engaged in any of the unlawful, tortious or inappropriate behaviour alleged against him, including, but not limited to, tortious conspiracy, placing Anson or Kassam in a false light, intentional interference with Anson's economic relations, appropriation of Kassam's personality, internet harassment of the Plaintiffs, or defamation.
- 5) Jacob is not John Murphy. He does not know John Murphy and he has no knowledge, information or belief as to who owns and operates a Twitter account under the user name @JohnMur67039142. Jacob did not have any involvement in the tweets made under the user name @JohnMur67039142.
- 6) Jacob does not know who the Unknown Defendants are ~~John Doe~~ is. He has no knowledge, information or belief as to who those persons described in the Fresh as Amended Statement of Claim are. Jacob is Robert Doxtator's ("Robert")

cousin but he has not conspired, agreed or participated in any agreement or conspiracy with Robert or any of the other Defendants. Most of his discussions with Robert are about family or hunting.

- 7) Jacob does not trade in securities. Jacob is not savvy about capital markets and did not deliberately fabricate allegations about the Plaintiffs to sabotage their business. He never had any knowledge of the Plaintiffs prior to this litigation. Jacob has never posted any information about the Plaintiffs on the internet or otherwise. Jacob had no prior knowledge of any of the allegedly unlawful postings that are referred to in the Fresh as Amended Statement of Claim. Jacob does not know who did post them.
- 8) Jacob does not know if any of the Plaintiffs have a reputation in the community that is capable of being damaged as alleged in the Statement of Claim. He denies the Plaintiffs have suffered any damage as alleged. If they have, their own actions are the cause of that damage.
- 9) Until served with this claim (in an unlawful manner), Jacob had never seen any of the postings alleged in the Fresh as Amended Statement of Claim. He had no knowledge that the websites called Stockhouse, Hindenburg Research or the other sites referred to in ~~listed in paragraphs 98 of the~~ Fresh as Amended Statement of Claim even existed.
- 10) Jacob had nothing to do with any communications with the regulators as alleged in paragraph ~~164~~ 64 of the Fresh as Amended Statement of Claim. Any ongoing inquiry, review or investigation into one or more of the Plaintiffs by one or more of the regulators is not within Jacob's knowledge but is within the knowledge of the Plaintiffs and should be disclosed.

- 11) Contrary to the allegations in paragraph 65 of the Fresh as Amended Statement of Claim, Jacob did not write or contribute to the Defamatory Manifesto.
- 12) Contrary to the allegations in paragraph 90 of the Fresh as Amended Statement of Claim, Jacob did not tweet the first link to the Defamatory Manifesto on www.MoezKassam.com.
- 13) Contrary to the allegations in paragraph 108 of the Fresh as Amended Statement of Claim, Jacob did not publish the Second Defamatory Manifesto.
- 14) Jacob asks that the action be dismissed with substantial indemnity costs and costs as provided for in s.137.1 of the *Courts of Justice Act*.

January 21, 2021

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M5L 1A9~~

~~_____ Tel: (416) 863-2400~~

~~_____ Fax: (416) 863-2653~~

~~_____ Iris Fischer LSO No. 52762M~~

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Defendant

AND TO: **Kim Spencer McPhee**

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Suite 1203

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Megan B. McPhee

Email: mbm@complexlaw.ca

Won J. Kim

Email: wjk@complexlaw.ca

Tel: 416.596.1414

Fax: 416.598.0601

Lawyers for the Defendant,

James Stafford and the Defendant (Plaintiff by Counterclaim), Robert Lee Doxtator

COURT FILE No.: CV-20-00653410-00CL

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP,
ANSONINVESTMENTS MASTER FUND LP AND MOEZ KASSAM**

Plaintiff

and

**JAMES STAFFORD, ANDREW RUDENSKY, ROBERT
LEE DOXTATOR, JACOB DOXTATOR AND JOHN
DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4 AND
OTHER PERSONS UNKNOWN**
Defendants

**ONTARIO
SUPERIOR COURT OF JUSTICE
Proceeding started in Toronto**

AMENDED STATEMENT OF DEFENCE

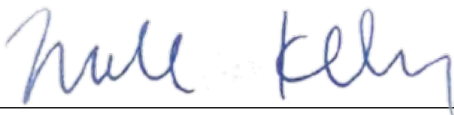
GROIA & COMPANY
Professional Corporation ■ Lawyers
Wildeboer Dellelce Place
365 Bay Street, 11th Floor
Toronto, Ontario M5H 2V1
Tel: (416) 203-4472
Fax: (416) 203-9231

**Joseph Groia, LSO No. 20612J
Kevin Richard LSO No. 43160P**

Lawyers for the Defendant, Jacob Doxtator

TAB 2E

This is **Exhibit “E”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Mark Kelly", is written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

Court File No.: CV-20-00653410-00CL

ONTARIO

**SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

BETWEEN:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP AND MOEZ KASSAM**

Plaintiffs

-and-

**JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR,
JACOB DOXTATOR, AND JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN
DOE 4 AND OTHER PERSONS UNKNOWN**

Defendants

STATEMENT OF DEFENCE OF JAMES STAFFORD

1. The Defendant, James Stafford (“Stafford”), admits the allegations contained in paragraph 8 and paragraph 15 of the Fresh as Amended Statement of Claim.
2. Stafford either has no knowledge of or denies all other allegations in the Fresh as Amended Statement of Claim, except to the extent expressly admitted herein. Stafford further denies that any of the Plaintiffs are entitled to any of the relief sought in paragraph 1 of the Fresh as Amended Statement of Claim.

James Stafford

3. James Stafford is a publisher and journalist who operates the website www.OilPrice.com (“Website”). The Website is the most popular energy news site in

the world, and the 29th most popular financial news site in the world, with over 3.9 million unique visitors per month, and 18.9 million monthly page views (as of April 2022). It has a corresponding mobile app, as well as a free newsletter and paid subscriptions, with a rapidly expanding global reach.

4. The Website has provided news and analysis to various other reputable financial news outlets, including Time, Fortune, CNN Money, USA Today, Yahoo Finance, Fox Business, and many others. It employs a roster of journalists, editors, and traders to conduct research and write articles of interest to the energy sector.

Other Defendants

5. Stafford has never met, spoken, or otherwise communicated with Jacob Doxtator. Prior to being served with the Claim, Stafford had never even heard of Jacob Doxtator.
6. Stafford was introduced to Andrew Rudensky (“Rudensky”) through a mutual acquaintance many years ago. Rudensky is a trader whom Stafford consults from time to time regarding his knowledge of the capital markets. Stafford has also invested in some of Rudensky’s business dealings over the years, and the two share a casual friendship.
7. Stafford was introduced to Robert Doxtator through a mutual acquaintance in or around July 2020. Prior to then, Stafford had never spoken with, met, or otherwise communicated with Robert Doxtator.
8. Stafford does not know who the unnamed defendants are.

There Was No Conspiracy

9. Stafford denies having any involvement in the making and publication of the Unlawful Statements as defined in the Fresh as Amended Statement of Claim (“Claim”).
10. Stafford denies entering into an agreement with any of the other defendants to make and publicize the Unlawful Statements against the Plaintiffs with the predominant purpose of injuring the Plaintiffs by damaging their business and reputation.
11. Stafford further denies carrying out an alleged conspiracy with the other defendants by any unlawful means with the knowledge that the Unlawful Statements would harm the Plaintiffs.

There Was No False Light

12. Stafford denies giving publicity to false allegations against Anson and Kassam that placed them in a false light.
13. As noted above, Stafford was not involved in making and publishing the Unlawful Statements.
14. In any event, there is no falsity in the Unlawful Statements for Stafford to have knowledge of, or to have reckless disregard for. The Unlawful Statements are, to the best of Stafford’s knowledge, substantially true.

No Intentional Interference with Economic Relations

15. Stafford denies making any false, malicious, defamatory, or unlawful public statements about Anson's principal, Kassam, or other Anson personnel with the intent to harm Anson's business and damage its reputation.
16. There was no deception of third parties by the subject matter of the Unlawful Statements. Any harm to Anson's reputation or business allegedly experienced is a direct result of the Plaintiffs' own conduct, including its involvement in an ongoing criminal investigation by the U.S. Department of Justice.

No Appropriation of Personality

17. Stafford denies purchasing the domain name www.MoezKassam.com or using it to publicize the Unlawful Statements. Stafford also denies acquiring the email address info@moezkassam.com in furtherance of the alleged conspiracy.
18. In any event, Moez Kassam is not a celebrity, and the acquisition of neither the domain name www.MoezKassam.com nor the email info@moezkassam.com constitutes an exploitation or appropriation of a proprietary right by Kassam to market his personality for commercial gain.

No Internet Harassment

19. Stafford denies engaging in a "defamation campaign" or writing, disseminating, and publicizing the Unlawful Statements.

20. In any event, the writing, dissemination, and publication of the Unlawful Statements does not constitute “extreme conduct that is beyond all bounds of decency or tolerance”, and has not caused harm to the Plaintiffs.

No Defamation

21. Stafford denies making the Unlawful Statements, including any and all alleged defamatory statements contained therein.
22. In the alternative, Stafford relies on the defences of fair comment and/or justification. The subject matter of the Unlawful Statements concerns the fairness and integrity of the capital markets, and the damage that is caused to companies and shareholders by the short-selling tactics allegedly employed by the Plaintiffs. This is a matter of public interest.
23. Furthermore, all of the alleged defamatory statements in the Unlawful Statements are either opinions which are generally incapable of proof, or statements of fact that are substantially true. Neither constitute defamation.

This Action is an Abuse of Process, and a Proceeding That Limits Freedom of Expression on Matters of Public Interest

24. Stafford pleads and relies on s. 137 of the *Courts of Justice Act*, and reserves the right to bring a motion under s 137.1 (2) at any time in this proceeding.
25. This proceeding was commenced in bad faith for the purpose of discouraging individuals from expressing themselves on matters of public interest related to the Plaintiffs’ questionable business practices and the corresponding fallout in the capital

markets. If allowed to proceed, it will stifle broad participation in debates on these matters of public interest, and defeat the objectives of s. 137.1 (1) of the *Courts of Justice Act*.

26. The claim against Stafford is also scandalous, frivolous, and vexatious, and an abuse of the process of this court. It is rife with improper pleadings, including the pleading of evidence, and was drafted for a different audience than this court.
27. Furthermore, the claim is substantially the same pleading that was drafted by Anson's former solicitors who were simultaneously representing Stafford on a related matter. It is tainted by the misuse of confidential information obtained by Anson's former solicitors in their capacity as Stafford's former counsel, and should be struck as an abuse of process.
28. Stafford requests that the action be dismissed against him in its entirety, and that he be awarded substantial indemnity costs of the action and costs as provided for in s. 137 of the *Courts of Justice Act*.

June 28, 2022

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Kassam

AND TO:

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Defendant

AND TO:

ALLEN SPEKTOR

allenspektor@gmail.com

Defendant by Counterclaim

Court File No.: **CV-20-00653410-00CL**

ANSON ADVISORS INC. ET AL
Plaintiffs

- and -

JAMES STAFFORD ET AL
Defendants

ONTARIO
SUPERIOR COURT OF JUSTICE
(Commercial List)
Proceeding commenced at Toronto

**STATEMENT OF DEFENCE OF JAMES
STAFFORD**

KIM SPENCER MCPHEE BARRISTERS P.C.
1200 Bay Street, Suite 1203
Toronto, ON M5R 2A5

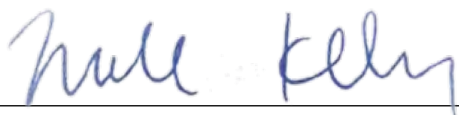
Won J. Kim (LSO # 32918H)
E-mail: wjk@complexlaw.ca
Megan B. McPhee (LSO # 48351G)
Email: mbm@complexlaw.ca
Aris Gyamfi (LSO# 61390P)
Email: ag@complexlaw.ca

Tel: (416) 596-1414
Fax: (416) 598-0601

Lawyers for the Defendant, James Stafford

TAB 2F

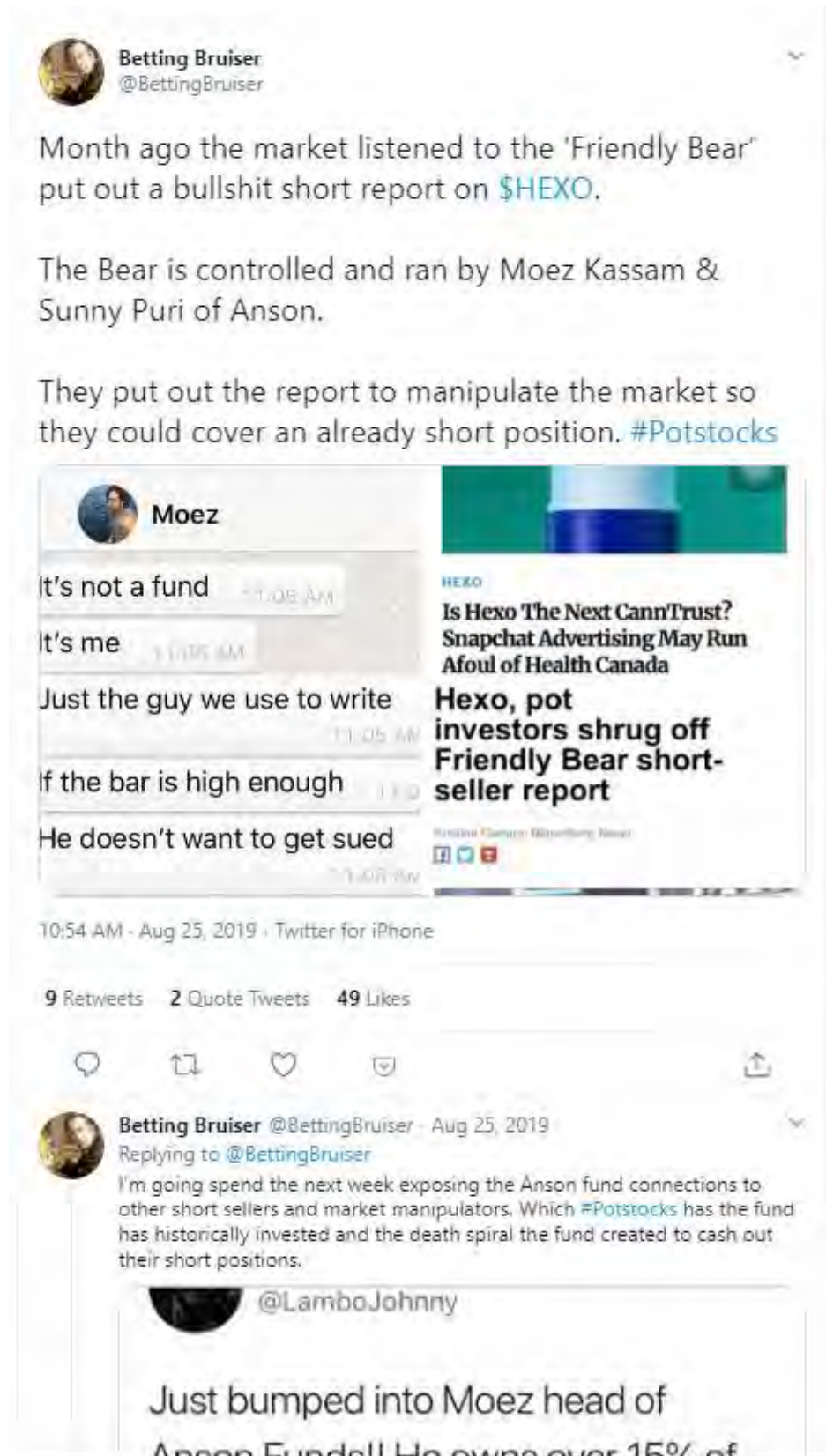
This is **Exhibit “F”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Mulligan Kelly", is written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

APPENDIX "A" – "Betting Bruiser" Tweets











Betting Bruiser
@BettingBruiser

A lot DM's about \$ZENA & Anson Funds.

Anson Funds holds a boatload of converts in \$ZENA that they are using to cover their short position.

They've had a direct hand creating chaos within management decisions. Including the listing price. How so? Anson representative! #Potstocks



Adam Spears
Independent Director

- Founder of ace148, an investment company
- Was a Principal and Portfolio Manager at Anson Funds where he managed multiple long-short equity hedge funds
- Also worked in private equity at ONCAP Management Partners, and in the investment banking group of Citigroup Global Markets

9:09 AM · Aug 26, 2019 · Twitter for iPhone

4 Retweets · 4 Quote Tweets · 35 Likes

-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
Replying to @BettingBruiser
The entire problems relating to the former CEO leaving, taking the \$TLRY deal and now death spiral financing. Was in relation to \$ZENA attempting to limit Anson's ability to cover and manipulate the share price down further. The current \$ZENA CEO is out of league. #Potstocks
-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
\$TLRY themselves wanted to offer a helping hand. As that company is the only successful #Potstocks to date to squeeze Anson Funds for a loss to my knowledge. Despite Anson Funds getting @CitronResearch to pump out as many \$TLRY short pieces it possibly could. #Potstocks
-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
I'd love to talk to the @CEO_Zenabis to try to help... but it may be a case of little to late ... CEO wants to convert all debts to a bank loan... that's a start but expect Anson Funds to fight tooth and nail against that. Their independent director acts for Anson. #Potstocks
-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
As in the case with \$HEXO ... I wouldn't doubt that Adam is recording conversations of \$ZENA management and executives in hopes of Anson blackmailing or using the info for the detriment of the company. Adam needs to be removed. #Potstocks
-  **Chris Rutherford** @RutherfordCG · Aug 26, 2019
Replying to @BettingBruiser
How is it legal for Adam to be on the board and do what this guy is doing? It's not in the best interests of @Zenabis obviously. @CEO_Zenabis
-  **Betting Bruiser** @BettingBruiser · Aug 26, 2019
No it's not ... like \$AEF Anson will argue that they acting in best interest of the shareholder ... all a guise ...







Betting Bruiser
@BettingBruiser

...

The biggest chicken hawk that I've ever met in my life.
Every time I see him we have words.

Sunny Puri from Anson Funds.

If you've ever crossed paths with him then your stock is
likely -95% from its high and he holds your faint in his
hands via convertible debt. [#PotStocks](#)



11:11 AM - Mar 11, 2020 · Twitter for iPhone

4 Retweets 39 Likes



Betting Bruiser
@BettingBruiser

...

Watch "Moez Kassam" from Anson Funds on [#Vimeo](#) give short sellers a bad name. Cringe worthy. I think that's filmed at [@DeFrancesco_A](#) house in the Muskoka? vimeo.com/140274640 [#PotStocks](#)



Moez Kassam

This is "Moez Kassam" by Charles Chan on Vimeo, the home for high quality videos and the people who love them.
vimeo.com

1:54 PM · Jul 2, 2020 · Twitter for iPhone



Betting Bruiser
@BettingBruiser

...

Replying to [@BettingBruiser](#)

Director: Rick Brar former CEO & Co-Founder of [@Zenabis](#) [\\$ZENA](#)

Secretly gave Anson Funds a share loan agreemnt so they could short [\\$ZENA](#) to the dismay of retail investors. Upon finalizing that he aggressively dumped all his shares. [\\$ZENA](#) -98%. \$2.25 to \$0.08 [#PotStocks](#)
2/9

9:50 AM · Jul 6, 2020 · Twitter for iPhone



8 Retweets 2 Quote Tweets 63 Likes



Betting Bruiser
@BettingBruiser

photo

Something that was wrong about the Anson and Moez article circulating was the allegation that Moez/Anson compensates people to write reports. They just use people and don't pay anyone but themselves. [\\$ZENA](#) [\\$APHA](#) [#PotStocks](#)

11:08 AM · Sep 30, 2020 · Twitter for iPhone

2 Retweets · 28 Likes



Betting Bruiser
@BettingBruiser

One thing that was left out of the [\\$ZENA](#) and Anson Funds report was fact that Anson's funds legal counsel (Laura Salvatori) husband (Muneeb Yusuf) via Brownstone Advisors facilitated the toxic financing deal between [\\$ZENA](#) & [\\$TLRY](#) ... conflict of interest much? [#Potstocks](#)



Brownstone Advisors Inc. ("Brownstone") acted as strategic advisors to Zenabis in connection with the Supply Agreement. Zenabis will pay a strategic advisory fee to Brownstone, which fee will include (subject to receipt of all required regulatory approvals) 319,148 common shares of Zenabis.



Corporate Director
Brownstone Capital
2018 - Present • 2 y
Toronto, Canada Area

1:50 PM · Oct 9, 2020 · Twitter for iPhone



Betting Bruiser @BettingBruiser · Oct 9

Replying to @BettingBruiser

Hi Laura 🙋 ... cause I know you follow every tweet I speak about Anson ... I thought I'd give you a shoutout! [\\$ZENA](#) [\\$TLRY](#) [#PotStocks](#)



4



38



Betting Bruiser @BettingBruiser · Oct 9

If you r an Anson Fund investor ... be prepared to have your funds locked up b/c there is a lot information floating out there that paints a picture of scams to benefit none other then Moez Kassam. [\\$ZENA](#) story is just one of hundreds were its alleged he broke the law. [#PotStocks](#)



4



32





Betting Bruiser
@BettingBruiser



Maybe I should speak to regulators about Anson Funds
and collect the reward in 50 years

Or should I just leak snippets of recorded conversations
with Moez Kassam?

Thoughts? [#PotStocks](#)



2:17 PM · Oct 9, 2020 · Twitter for iPhone

6 Retweets 1 Quote Tweet 83 Likes



Betting Bruiser
@BettingBruiser

I think I'm going release some of the recordings about Moez Kassam ... just interested how much money Anson pays Ben Axler from @sprucepointcap ... you care to comment Ben?

"You know what's gonna happen"

14:47

"A lot of times if I'm working with Ben (Axler) or doing this kind of stuff (shorts) than **we can create our own catalysts right because we're putting out a report**"

"So I know when stuffs gonna go down and I'll buy puts"

3:19 PM · Oct 9, 2020 · Twitter for iPhone

3 Retweets **2** Quote Tweets **64** Likes



Betting Bruiser
@BettingBruiser

Everyone have a good long weekend expect for Anson Funds Moez Kassam he can choke on a wishbone!
[#PotStocks](#)

4:55 PM · Oct 9, 2020 · Twitter for iPhone

4 Retweets **1** Quote Tweet **105** Likes



Betting Bruiser
@BettingBruiser

...

Has Anson Funds and/or MMCAP name all over it
\$VIVO #PotStocks

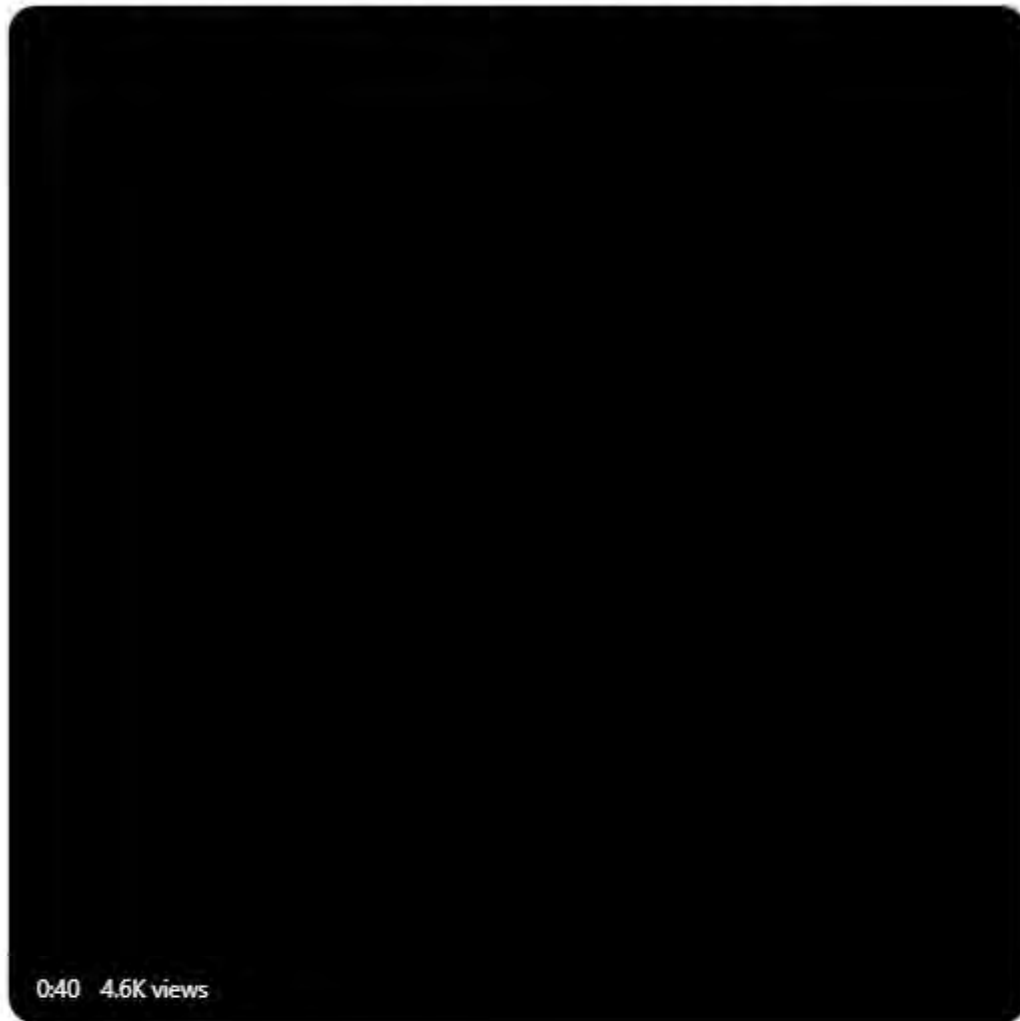


8:33 AM · Oct 16, 2020 · Twitter for iPhone



Betting Bruiser
@BettingBruiser

This is Moez Kassam from Anson Funds in the flesh running scared from recent reports about his tactics. Worth a listen. This guy is scum of the earth.



10:50 AM · Oct 30, 2020 · Twitter for iPhone





Betting Bruiser
@BettingBruiser

...

Happy Halloween to the #PotStocks community!

Trick or Treat:

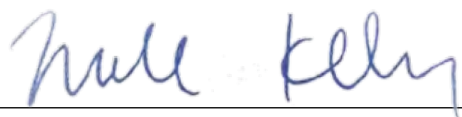
Who is going to toilet paper Moez Kassams house tonight? \$ZENA executives should just throw stock as it's cheaper then toilet paper!



12:48 PM · Oct 31, 2020 · Twitter for iPhone

TAB 2G

This is **Exhibit “G”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Julie Kelly", is written above a horizontal line.

A Commissioner for Taking Affidavits
LSO# 84488D

APPENDIX “B” – “John Murphy” Tweets





John Murphy @JohnMur67039142 · Jul 24

@MunchingMoez #ansonfunds, paid for the report as they were caught offside, rumours off 900k in the single digits, called in a favor and doubled down @HindenburgRes moez was telling ppl it was going to 6.00, even called prop desks wanting them to short



John Murphy
@JohnMur67039142

...

it seems moez and sunny from @AnsonGroupFunds @MunchingMoez @HindenburgRes @globeandmail @davidmilstead quickly blocked me by suggesting they were short 1mm \$FD. i think much more will come out on this trade. @business @BNNBloomberg



John Murphy @JohnMur67039142 · Jul 28

Looks like @facedrivecanada \$FD is going higher @HindenburgRes @AnsonGroupFunds finance.yahoo.com/news/400-tesla...

7:41 PM · Jul 30, 2020 · Twitter for iPhone



John Murphy @JohnMur67039142 · Aug 14

@HindenburgRes @BNNBloomberg @AnsonGroupFunds this story will be all over the street within months. how dirty **moez** hurt his business parnter and lied to the founders of **Sapha**. @LamboJohnny @BettingBruiser



MDeCicco @MDeCicco_ · Aug 14

Hey @MunchingMoez. Can you confirm/deny? The word around is that you were the source of the @HindenburgRes Short Attack on @aphriainc, to cover HUGE losses on \$TLRY

[Show this thread](#)



John Murphy @JohnMur67039142 · Aug 14

SFD #moezkassam paid for negative promotions on **SFD Sapha \$tlry** and many more. was this disclosed by publisher? @AnsonGroupFunds @HindenburgRes @BNNBloomberg @BettingBruiser \$tlry Sapha #shortsellers @IIROCinfo



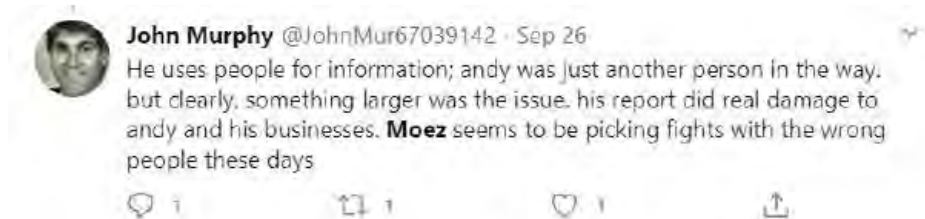
Stockhouse.

Just read this on Yahoo: short seller Moez Kassam go...
Just read this on Yahoo: short seller Moez Kassam got
BURNED

stockhouse.com







Jim Retweeted



John Murphy @JohnMur67039142 · 27 Sep

8 Capital's [#tradertonny](#), plays right into the stereotype of a [#WallStreet](#) trader. i think his compliance might have some questions about the recommendations that he has been putting out.... [#viiiicapital](#)
[@MunchingMoez](#) stockmanipulators.com/moez-kassam-an...



1 retweet 1 like



John Murphy @JohnMur67039142 · Sep 29

sounds like [#moez](#) attacked the site where the [@AnsonGroupFunds](#) report was profiled. a very expensive DDOS attack to prevent the public from seeing the piece. Investors in the fund probably have plenty of questions for [@MunchingMoez](#) [@davidmilstead](#) \$apha \$fd \$gfi \$shrm many more

3 replies 1 like



John Murphy @JohnMur67039142 · 15m

spicy. stinks something awful !!! [#handsomefunds](#) [#dirtymoez](#)
[#moezkassam](#) [@AnsonGroupFunds](#) [@LamboJohnny](#) [@QTRResearch](#)
[@weedstreet420](#) [@ddale8](#)



John Murphy @JohnMur67039142 · Sep 27

i wonder if this slows down his extravagant dinners that he posts every night. sean kallir from HGC seems to be in attendance often. [moez's](#) new member. special shout out to [#tradertonny](#) from 8capital. love the pics

1 retweet 1 like



John Murphy @JohnMur67039142 · Sep 29

big difference from shorting a fraud and paying for a short report calling a company a fraud to try and fix your trade. bad companies need to be taken down. big difference between the two. **anson** does both!



John Murphy
@JohnMur67039142

Home stockmanipulators.com. Cyber crimes added to the list of wrongdoings by @AnsonGroupFunds ? who funded this defense? unit holders? @davidmilstead @globeandmail @thomasg_grizzle

7:52 AM · Sep 29, 2020 · Twitter for iPhone



John Murphy @JohnMur67039142 · Sep 30

chatter is \$300k-400 for that report. a deep audit of **anson's** books might help.



John Murphy @JohnMur67039142 · Sep 30

Anson and Moez put out this response. it fails to address the allegations outlined, when they question a company they ask for a line by line response. we are waiting @MunchingMoez [ansonfunds.com/wp-content/upl...](https://ansonfunds.com/wp-content/uploads/2020/09/Anson-Response-to-Questions-Regarding-Short-Selling-Operations.pdf) @QTRResearch @BettingBruiser @LamboJohnny @weedstreet420 @davidmilstead

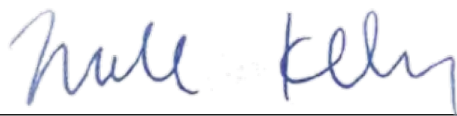






TAB 2H

This is **Exhibit “H”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Mulligan Kelly", is written above a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D



The Real Story on Moez Kassam and Anson Funds – Part 1

So here is the beginning part of the tale about the corrupt and criminal CIO at Anson funds?

A few short years ago Moez Kassam was a high flying star in the hedge fund space. He had \$1 billion under management (now down to \$250 million and falling) and was the praise of the financial community. But what people don't know is that his media praise was paid for (like when Toronto Life covered his wedding – paid for and made to look like an editorial - shame). But even worse he made his money the dirty way, treading on people, lying and using every trick in the book to bring companies down that he bet against. Whatever it took, whoever he ruined financially or reputation wise he would do it to turn a profit. But things started to go wrong for Moez and it all started with a Canadian cannabis company called Tilray. Apparently Moez and Anson got in the initial funding rounds at \$3 (good business if you can get it). But then as people like Moez are he got greedy and started shorting July/August around the \$40 to \$50 range. According to sources this was a naked short with a small borrow (naughty boy Moez). Then Tilray ran to \$120 and people became aware he was short. The rumours are 1.5 to 3 million shares short (ouch). Tilray then runs to \$200's and TD bank threatened to pull his lines. These troubles nearly ended the fund as their shares were restricted until early 2019 (Jan-Feb) - check SEDAR.

Then time progressed and in the month of Sept it is rumored that the fund entered into several private stock sales to raise capital while the stock was well over \$100.00

Anson also called in some favours from several Toronto based hedge funds to provide additional liquidity by purchasing positions to bolster cash. Samara Master Fund Ltd (Ben Cubitt) & Parkwood Capital Inc. (Dan Sternberg) These purchases were unlikely in the best interest of the unit holders of these two funds. Transactions would not have been disclosed to their investors.

In the fall of 2018 Anson / Moez had several meetings with their prime broker to discuss their liquidity crisis (one can only imagine the disgusting scene of Munching Moez groveling at their feet). This window provided Anson additional time to raise capital to hold the short position and hope for a decline. How did he stop TD from pulling his lines? Well I think that's something for IIROC to look into. IIROC will you be doing something?

- * Throughout this period the fund would have managed a large naked short position which was a significant credit risk to the bank and continued to leverage relationships to avoid any major buy-ins.
- * the management of this naked short position and margin calls would have seen numerous security violations as every favour imaginable would have been utilized in an effort to protect the funds solvency.

Now what I and I hope anyone reading this is thinking is, "how is this legal? Surely numerous securities rules must have been violated? What were the banks that he was working with doing at this time – something smells very foul here and a smell this bad needs to be looked into. IIROC?

From my viewpoint as a fairly informed observer there are huge regulatory infringements happening and it seems like all of the bad actors are getting away with whatever they want with a wink and a nod zero repercussions for their illegal behavior. Is anyone at the exchanges sharing drinks with the this little rascal. Maybe someone should investigate this.

So we turn to Facedrive and apparently our vertically challenged friend has again been caught naked with a small borrow. How has he amassed such a large short position (rumors are it's in the 1.5 to 2 million share range) Is this legal? IIROC will you be investigating how Moez creates paper??

Now turning to something else. This is really a questions for Anson Fund investors. Are you aware of Moez's drinking and eating habits? Take a look at his Instagram page. @munchingmoez (IG) to this day Moez regularly shares his early alcohol consumption during business hours on weekdays often followed by high end catered dinners with many Toronto's top culinary teams for an assortment of quests; including many of his Short interest partners in attendance. (Dan and Ben) This certainly makes one question when does Moez have time to manage 3rd party assets as he seems to enjoy socializing on his public platform without any regard for criticism that may follow these choices. Investors – do you want a drunken glutton managing your money?

So that's the end of part one. Over the next few days I will be revealing some of his even more shady deals and how he has used corruption, lies and foul play to advance his rotten agenda. Also how he and his band of foul cronies just create paper out of thin air. Nice trick but I don't think it's legal Moez – I think someone needs to audit your books, carefully. Stay tuned especially IIROC, juicy bits coming for you folks.



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 Court File No./N° du dossier du greffe : CV-20-00653410-00CL
 Toronto Superior Court of Justice / Cour supérieure de justice

Moez Kassam and Anson Funds - Short \$500 M And Lose It All

I thought it would be fun to share about this fund manager in Canada – some awful little grot called Moez Kassam who lost \$500 million on a Tilray short.

It started in 2018. Moez and Anson funds got into the private rounds of Tilray when it was \$3 a share. The problem was he got greedy and when the stock flew he started shorting in July/August around the \$40-\$50 range.

But then Tilray ran to \$120 and people on the street became aware that Moez was dangerously short, possibly to the tune of 1.5-3 million shares.

And it got worse: Tilray kept running into the \$200's and TD bank threatened to pull Moez's lines.

Moez and Anson punched way above their weight with Tilray and the scheme nearly ended the fund as their shares were restricted until early 2019. By September 2019, rumor had it that Anson was desperately entering into private stock sales to raise capital while the stock was well over \$100.

In the fall of 2018, Anson/Moez had several meetings with their prime broker to discuss their liquidity crisis. In other words, to grovel. The grovelling bought Moez time to raise capital to hold his short position and hope for a decline. The real question is this: How did Moez stop TD from pulling his lines and enforcing the large capital calls against a position that should have ended his business?

Buying time can't be free, and TD may have been playing with regulatory fire here. Anson's huge naked short position, after all, represented a massive credit risk to TD Bank, yet Moez continued to leverage his relationships there to avoid any major buy-ins. Furthermore, the bank managers of this naked short position and margin calls would have certainly seen numerous securities violations as every favor imaginable would have been utilized to protect the fund's solvency. If regulators catch up to the brokers and banks involved in this episode, the scrutiny could be dangerous for a lot of people—and Moez certainly wasn't worth it. Especially with the regulatory fire that will be coming his way soon.

Rumours are Moez lost around \$500 million on this dodgy short strategy. Interesting story for all you cannabis investors and there are more as he also attacked a lot of other cannabis companies breaking a lot of laws in the process. More on that in the future. Especially how he was the man behind the Aphria - Hindenburg report and how much he made from it.



The Real story on what happened with Moez Kassam and Aphria

Ok, I've seen a few threads on here and other boards about what happened with the Hindenburg short report and a number of people saying Moez Kassam was involved. And I wanted to set the record straight as these people are 100% correct and it's long overdue that Moez is exposed for what he really is.

There are three names you need to be aware of, and they're all connected: Moez Kassam, Anson Funds and Hindenburg.

This trifecta, led by Moez Kassam, is the disease that hit Aphria shareholders and ended up doing massive damage to investor confidence across the entire cannabis sector.

Moez Kassam (of Anson Funds) was behind the Hindenburg short report that hurt Aphria shareholders. And he made a killing on it.

Let me take you through the scheme because it's worth detailing.

For starters, Kassam was a large holder of Aphria stock. He was "friends" with management and the founders, with copious amounts of drinks and involved and all around great time. But what these people didn't understand was this: Kassam is a corporate sociopath of the worst kind. He's quite good at it, too. He talks the talk and worms his way into friendships that he fully plans to betray for a dollar at the first opportunity.

But while he was courting his Aphria friends, Kassam nearly lost everything in a failed short campaign against Tilray. He got crushed here. He lost \$500 million. He became desperate. A desperate sociopath (never a good combination).

To pull himself out of this disaster, he decided to betray his friends and colleagues at Aphria.

He started feeding Nate Anderson of The Hindenburg Report sensitive, insider information that he obtained from his friendships with Aphria management and founders – sprinkled with a load of nonsense to help his story along.

Nate—another bottom-feeder in the short-selling world—would probably prefer not to do business with the likes of Kassam, a known liar and cheat, but he has a business to run and took the bait.

And Moez continued to feed him information that he knew would hurt Aphria. But he tried to cover his tracks and remove any connection between himself as the insider leak and Nate, as the publisher of the Hindenburg Report. That's where another figure that even makes bottom feeders look appealing comes into play: Sunny Puri, who created the distance between the two and did all the dirty legwork.

Right before the Hindenburg report was released, Kassam and his Anson Fund went short Aphria (a good investigation of their various funds should root this out). As Kassam anticipated, the report sent shockwaves through the industry and crashed Aphria stock. This caused massive damage to the company and its investors.

Of course, to the outside world Kassam feigned shock as well to avoid suspicion even though he had orchestrated the entire scheme and illegally fed Nate insider information.

But these things are hard to control sometimes. They become beasts of their own. Kassam then realized the stock had fallen too far. His response: Start buying. And he had help to do that: Andrew Left of Citron Research, yet another bottom feeder. Kassam engaged Left to write a positive research report on Aphria.

Kassam went around telling people (I heard it myself) that he had used his relationship with Left (a short seller) to put out a positive piece of research on Aphria. This was supposed to demonstrate that he had only the best intentions for the company and that he was "one of the crew" doing everything he could to support them.

So Left's report goes out and the stock jumps and Kassam makes another pile of money and also gets all the gratitude of the Aphria folks as a major team player. But he was playing both ends.

Aphria clearly needs to get smarter, but there aren't that many corporate sociopaths on this level, so they can be forgiven for being taken for a ride here to some extent. They won't let it happen again, and with a bit of help from regulators and those of us who actually know who these people are, perhaps no one in the cannabis industry will fall victim to this again.

Regulators have sort of dropped the ball here. What they should be looking at is the relationship between Andrew Left/Citron Research and Kassam, for which I am sure—based on talk most people on the street have heard—will have some bread crumbs to follow. They do cover their tracks quite well, but they also have loose lips in public. What is often an open secret on side streets eludes the regulators. They just need to know where to look.

Kassam has betrayed nearly everyone he knows, so he will run out of friends soon and even his sociopath game-talking won't work much longer.

Copy and share as I'm sure Moez will try to have this post removed.

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Moez Kassam and Anson Funds Destroyed Zenabis – you guys got off lightly

I'm on here that you were also attacked by Moez Kassam and Anson Funds. Well all I can say is you got off lightly.

Check this story I found on another thread:

Moez Kassam and Anson Funds Destroyed Zenabis DealRoom (/dealroom)

Remember the Tilray short squeeze where Moez Kassam (Anson Funds) lost his shirt? Well, this is what he did right after that:

His target was another Canadian cannabis company—Zenabis. Now, Zenabis needed cash for expansion. That's Kassam's MO: Find a company desperate for cash and feed them a line of bull about being long while you drive them into the ground because you're short.

Kassam weaseled his way into Zenabis, promising to help them and dangling some cash in front of them for expansion and "advise" them. But what he ended up doing was completely destroying the company to get rich: He took it from \$7 to \$0.04 at one point.

So, with Anson Funds as an asset manager and advisor to Zenabis, the next move was to force them to appoint a director chosen by Kassam (yes, we've seen Kassam do this before, and it's insider trading to appoint your own stooge and then have him feed you intel on the company to use against it). In this case, Kassam's inside man in Zenabis was former Anson Fund manager Adam Spears, who was still working for Anson and Kassam in some capacity at the time this all went down. Spears, taking his orders from Kassam, convinced Zenabis to do all sorts of things that were hugely detrimental to the company and geared towards its destruction. It helped that the Zenabis CEO at the time, Rick Brar, was incredibly naive (he later caught on but when he did he was replaced immediately).

All along, Spears is feeding Kassam insider information so Kassam could better time the short sells and make even more money. YES, THIS IS ILLEGAL!

Kassam proceeded to short Zenabis stock heavily. And I mean—HEAVILY. The coup de grace was convincing Zenabis to go public overvalued so it would set Kassam up for a massive win on the downside. He made a fortune on this, shorting to \$0.10 from \$6.75. Kassam took this company from a \$950M market cap to ~\$60M. He screwed over all the shareholders.

Things got so bad for Zenabis that it had to go to Tilray itself for help getting out of the Anson Funds noose. Tilray gave Zenabis a cash advance that they dressed up with fancy language (non-dilutive financing in the form of a \$30M supply agreement) and failed to disclose the true nature of the deal to its shareholders. Then it got caught with its pants down: Zenabis paid \$15M of that debt with product and then couldn't pay the rest, which prompted Tilray to sue (which the two settled; otherwise Zenabis would probably have gone bankrupt).

Kassam completely destroyed Zenabis and its shareholders, and it was illegal every single step of the way, from insider trading to failures to disclose, to a line-up of feeder funds (Frigate Ventures, M5V Advisors (Formerly Anson Advisors), Winson Bruce Ross and/or Admiralty Advisors) that played questionable roles in these deals.

Who's next on Kassam's hit list? And are any regulators even paying attention?? I'll be posting more in-depth details on this shortly.



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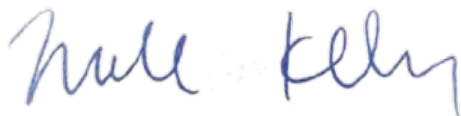
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TAB 2I

This is **Exhibit “I”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Julie Kelly", is written above a horizontal line.

A Commissioner for Taking Affidavits

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Company Ticker	Post Subject	Post Text	Post User Name & ID	Post Time	Post View	Post ID
C.ECU	Thoughts on the latest news release?	Id given up on this - but saw they just came out with the following release: http://www.stockhouse.com/news/press-releases/2014/08/07/gondwana-transitions-with-copper-acquisition What are your thoughts? Will we ever see our investment back?	ToffRaffles 282031	2014-08-12 11.56.40 AM	649	22832446
V.CTA	Hurts to watch this	Bought in February and felt quite clever for a while - but this is painful. We need some solid developments and for Kirchner to stop playing silly buggers. Noting new to add just needed to rant.	ToffRaffles 282031	2014-08-12 7.02.59 PM	224	22834345
V.PIPE	RE:Beginning to get attention	Slow but steady progress from management.	ToffRaffles 282031	2014-08-21 2.11.34 PM	202	22866037
V.FD	Edward is Upset Because Moez Kassam is Losing Money on FD	Poor Edwardoboo79; he gets paid per post from Anson Funds and now his paymaster is losing money hand over fist with his Facedrive short. You referenced the Hindenburg report. This as everyone online knows was a paid for hit piece by Anson. Why dont you look at the report on Moez Kassam and Anson Funds that is going around the internet. Find out just who you are working for. Pure scum. Heres the link just in case you havent read it: "https://marketcrimes.to/2020/09/28/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/"	ToffRaffles 282031	2020-11-18 5.44.10 PM	860	31927273
V.SCYB	Just the start	With it looking more and more likely that Biden will be the POTUS in the new year SOL and other names are going to fly. This is only the beginning.	ToffRaffles 282031	2020-11-18 5.52.58 PM	721	31927306
V.FD	Deal with Microsoft	Great work Facedrive management: https://money.tmx.com/en/quote/FD/news/8813278606865326/xA0Facedrives_TraceSCAN to Offer Global ContactTracing Services Powered by Microsoft Azure	ToffRaffles 282031	2020-11-19 9.13.38 AM	702	31929690
V.VZLA	RE:the Kereport	Thanks for sharing. Mike did a good job.	ToffRaffles 282031	2020-11-19 9.15.18 AM	28	31929698
V.FD	RE:Watch the basher rhetoric increase.....	Edwardoboo will be coming in hard with the bashing. Probably just got off the phone with Sunny and Moez. They will be upping his salary to \$15 per post if he can create multiple bashing profiles. No sweeter taste than short sellers tears.	ToffRaffles 282031	2020-11-19 11.45.40 AM	101	31933155
V.FD	RE:RE:RE:Watch the basher rhetoric increase.....	Here he is; Edwardo;s back; yay. More half witted twaddle from the man who couldnt even get a job in a convenience store and instead has to try and pull down companies for the pennies Moez and Anson tosses him. This company is going places my old mucker. Does Microsoft partner with anyone on the street? No; they know whats happening here and so does the market. Your boss is on the wrong side of this one and is going to lose BIG	ToffRaffles 282031	2020-11-19 9.34.18 PM	87	31938400
V.FD	RE:RE:RE:RE:RE:Watch the basher rhetoric increase.....	Your sure right Greendaze; I let my dislike for this grot get the better of me. It just shows that these funds have lost touch with reality when they are willing to pay a buffoon to write nonsense on a company just so they can try to squeak out of a losing position. Everything is looking very good here. Would like to see more news soon on Air Canada and some of the other initiatives, but these guys are not sleeping on the job; thats for sure	ToffRaffles 282031	2020-11-20 8.53.07 AM	60	31939462
V.FD	RE:RE:RE:RE:RE:RE:RSI EXTREMELY OVERSOLD	I doubt that much will be coming out in march. The majoruty seems to be held by management. Your boss wont last that long. Buys ins are going to put Anson in a very bad position very soon. Make sure you get paid upfront for your bashing Eddie	ToffRaffles 282031	2020-11-22 8.57.56 PM	59	31950066

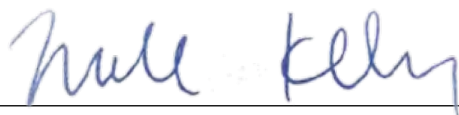
	G NEWS THIS JUST IN. DRAFTKINGS AND FANS?		282031	2020-11-27 8.32.18 PM		
V.FD	RE:RE:RE:RE: RE:The Investment Trend That Could Send Tesla To \$2 Trillion	Bring me in Eddie - im your huckleberry. Very happy to take down half-witted buffoons all day long.	ToffRaffles 282031	2020-11-27 11.07.27 AM	36	31988910
V.FD	Facedrive 3rd quarter results out – moving on up	3rd quarter results out for Facedrive here: < http://cloud.stockwatch.com/News/Sedardoc/4696249.pdf > Lots going on. Revenues arent huge; but the company is moving in the right direction. They also cancelled the Medtronics agreement which seemed to upset a few people on here (paid bashers) All in all this is what I think what most people expected. The next 6 months will be key as to where we end up. Holding and might add if there is a pullback.	ToffRaffles 282031	2020-11-27 5.34.53 PM	777	31992901
V.FD	RE:News....new high profile advisor	Yes - he is the real deal. Even the shorts surely cant bash this one.	ToffRaffles 282031	2020-12-18 12.50.38 PM	41	32140655
V.FD	So What Comes Next???	The news is great. Backed by Ontario and The First Nations and Microsoft as a partner. We need to look to the future now and think about what doors this will open. In Canada this puts huge pressure on others to join. Who will be next? Its also a great endorsement for foreign governments and companies to get involved. With new strains of Coronavirus making the vaccines almost useless contact tracing really is one of the best defenses we have and good old Facedrive is at the forefront of these developments. I should also add that they are backed by Vmware as well. So Microsoft and Vmware as tech partners - not too shaby. All eyese are on Facedrive. Come on!	ToffRaffles 282031	2021-02-18 11.49.23 AM	83	32596092
V.FD	What an investigation into Facedrive and Shorts would find	Good post on Yahoo Finance - must read for all Facedrive investors: As someone who has been in since the \$10 range I love the shorts here saying they hope for an investigation. What they do not want is an investigation and neither do their partners in crime, TD Bank, CIBC, RBC. They have been facilitating Anson Funds illegal behavior with Spoofing, downticking and wash trading. They have been miss-marking tickets and hiding the true extent of the naked short position Anson Funds has in Facedrive. They have ruined the market through their illegal actions and any investigation WILL expose this. The banks will sweep this under the rug, cut Anson Funds off and try to get the regulators to move on to mask their continuous illegal behavior. Should the stock be here on fundamentals? No of course not; but Anson and the banks have broken the market and this is why we are seeing the big jumps in share price and I imagine we will see even bigger ones in future when they are forced to cover the bulk of their naked short. This will end very badly for the shorts and I for one welcome an investigation into this whole drama. the banks who will be exposed as Anson Funds are just a grubby little predator	ToffRaffles 282031	2021-02-25 2.18.52 PM	389	32659850

		the spotted an opportunity and got caught. Now they cant get out of it and which are real buy ins happen this could be a textbook case for making naked short selling in Canada illegal with severe penalties. Im bullish and expect huge upside from here; not for underlying growth but everyone on the street knows how caught Anson Funds and their syndicate are and even with all their manipulation, paid social media writers, reddit commenters and a long list of other ways they have to pull a company down, they are out of tricks and know the end is coming soon. When the real covering starts this is going to make the recent upward moves pale into nothing.				
V.FD	RE:RE:What an investigation into Facedrive and Shorts would find	you have probably done it the right way and gotten the borrow. Anson absolutely have not. TD alone are north of 2 million shares naked short and RCB, TD Bank and others arent far behind. If you play the game fairly like you have then thats all good - but these guys dont plair fairly which is the real problem. The real naked short is rumoured to be around 8 million shares which is utterly insane and proves the market or regulatory regime in Canada is utterly broken. I can see this being in textbooks in the future for what can happen when hedge funds are allowed to go naked short and it all goes horribly wrong. Another poster on here said that Anson are waiting for a huge lockup to come free trading in March and that insiders will be dumping their stock. What happens if insiders dont dump and instead hold their shares? Anson have been promising the banks they will. We will see but if Anson are wrong this could explode as the banks will not put up with their lies and stalling any longer as the numbers no longer make sense and force them to cover.	ToffRaffles 282031	2021-02-25 3.13.49 PM	118	32660384
V.FD	RE:RE:RE:RE: RE:What an investigation into Facedrive and Shorts would find	Hahahaha - you are clearly a paid Anson Funds stooge. Moez only courts press and comes out when he is desperate and he is VERY desperate. Anson had a diabolical January and i have heard February is atrocious as well. He needs funds so Bloomberg put out that puff piece. They are going down.	ToffRaffles 282031	2021-02-25 8.41.22 PM	141	32667781
V.FD	RE: Sunny Puri of Anson Funds in trouble with unpaid escorts	Not surprising.	ToffRaffles 282031	2021-03-01 4.16.46 PM	65	32687920
V.FD	Confessions of a paid basher	Does any of this seem familiar here and on the other boards? "https://www.change.org/p/australian-public-stop-dishonest-practices-on-the-australian-stock-exchange-and-demand-a-royal-commission/u/27309590"	ToffRaffles 282031	2021-03-03 3.09.39 PM	87	32707138
V.FD	Medtronics locking up Facedrive stock for another year	Shorties; looks like there is no dump here "https://markets.financialcontent.com/ibtimes/news/read/41084618" So first management lock up, then Medtronics. Could this be a trend? Who will lock up next? Will any stock actually come out in the release???? The shorts were banking on tens of millions, now they are down to millions, where will it go to next? Nervous time to be a short.	ToffRaffles 282031	2021-03-09 2.18.53 PM	140	32754236
V.FD	RE:Who will lockup next? Will any stock be coming out?	Hopefully we will hear about more stock being locked up over the coming weeks. That would give this a big shot in the arm as the shorts scramble to find stock. (Naked shorts i mean)	ToffRaffles 282031	2021-03-09 7.40.45 PM	42	32756444

	RE:Medtronics locking up Facedrive stock for another year	Very huge short interest. Don't try and play us for mugs. Everyone on the street knows about the HUGE naked short Anson Funds and their syndicate have against Facedrive. Its the talk of Baystreet. This trade is going to go very badly for the naked shorts.	282031	2024-03-20 5:55:12 PM		02/00000
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TAB 2J

This is **Exhibit “J”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Mulligan Kelly", is written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

Moez Kassam



[HOME](#)

Exposing financial crimes and criminals

Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure

www.moezkassam.com

September 25, 2020

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Never has there been a bigger scourge of the Canadian capital markets. Moez Kassam and his Anson Funds have systematically engaged in capital market crimes, including insider trading and fraud, to rob North American shareholders of countless millions. In his attempt to destroy small-cap Canadian companies through nefarious means, a string of feeder funds and untraceable payments to elude regulators, Moez Kassam has betrayed even his closest friends. Now, the other shoe is about to drop as Kassam's funds run out and a string of failed attempts at illegal destruction leave this naked short seller truly naked.

This is part 1 of a 3-part series.



Note: Please do copy and share this report. Only if enough people raise their voices will the regulators actually do something about it. If you have any information on **Moez Kassam** and Anson Funds please send to info@moezkassam.com We promise 100% confidentiality – your name and details will not be used. Just the information you have.

(Thanks to all of you who have sent in reports, data and evidence a so far. To be honest, we had no idea the response would be so overwhelming. We will ensure it all ends up in the right hands. Please keep on sending – the more we present to the authorities, the quicker we can get this toad out of the markets and into a cell where he belongs.)

Moez Kassam used to be an up-and-coming self-proclaimed star in the Canadian hedge fund space. He had \$800 million under management and enough money to pay for extensive media coverage praising himself.

Now, he's lost most of that and has become the "Toad of Bay Street".



He's lost his friends, too—almost all of whom he betrayed in underhanded and illegal short-selling schemes, including the best man at his wedding whom he threw under a speeding short-selling bus. (Blood, it would seem, is not thicker than water).

His \$800 million is now down to around \$350 million at best—and falling by the day.

In the meantime, Moez Kassam has become the symbol of everything that is wrong with capital markets.

Even Kassam's acquaintances have flipped amid all the betrayal. Now, they're sources against him, with several coming forward to share information. With their help, a team of investigators is following all the threads of the questionable and illegal activities Kassam has pursued in an attempt to make money by destroying small companies and the lives of anyone who happened to get in his way: even those who helped him and ended up being disposable.

These sources have described at length how Moez Kassam and Anson have profited off the fear they create for their own financial gain and destroyed legitimate businesses.

The overall consensus is this: If you see him slinking around, steer clear as his illegal activities will end up taking down even the brokers and banks who fell for his elaborate schemes. Word on the street is that Canaccord has just dumped him as his business practices have become far too risky for the firm.

enterprise, Anson Funds.

Moez Kassam's MO

Kassam's MO is to create a false sense of loyalty by offering to help small companies in need of cash.

His strategy is to buy influence and then put the company into a vulnerable position. Then he strikes.

While one hand is offering up private placement money, the other hand is shorting the same company by a far greater amount (even in Canada that is illegal).

Private placement money coming from Moez Kassam is toxic money that comes with self-destructing strings attached.

Meanwhile, the trading desks and loan posts are feeding him non-public information and giving him the means to execute these transactions and in exchange for these deals are getting huge fees for it and also skirting regulatory rules.

The SEC, IIROC, OSC, and other regulatory bodies have taken note, and it is now expected that they will start acting on the information they already have.

INSIDER TRADING AT ITS WORST

It's one thing to pay *Toronto Life* to cover your wedding and pretend you're important enough to make it an "editorial". Ego is a slippery beast that doesn't care if praise is real or not.

But it's quite another thing to weasel your way into a private placement for a junior company, demand in return that one of your own stooges be placed on the board, and then use that mole to drive shares down while you've taken a huge short position on the company on the side.

That's insider trading of the worst kind.



They don't serve food like than in prison Moez

How Moez Kassam Cheated Zenabis

What Kassam likes to do is place a figurehead as the director of a company and that director then feeds him non public information on the company as he shorts it down and then covers on the private placement.

That's what he did to Canadian cannabis company **Zenabis Global Inc -ZENA.TO**

Zenabis owned 660,000 square feet of fully licensed, high-quality indoor facility space, as well as 2.1 million square feet of greenhouse space in late-stage construction, with cultivation underway in the licensed areas. To completely develop the assets in question Zenabis had to raise a lot of cash. All while proving themselves as a low-cost producer.

Anson Funds came to the rescue here, dangling cash in front of Zenabis, with some dangerous invisible strings attached. Again, the game was to take a visible long position in Zenabis and a much larger (10x) secret short position. Then attack while Zenabis is busy drooling over the cash and buying into the lie that Moez Kassam is trying to help the company.

According to a source close to the Zenabis deal with Anson Funds, the CEO of Isodiol International, Marco Agramont, most likely introduced Zenabis to Anson Funds. The game plan: to take the share price down from \$6 to \$0.04, just like it did with Isoldiol, by acting as a privately held alternative asset manager and advisor to both companies.

influencing Zenabis by appointing their own director, which in this case was Adam Spears, who was still working with Anson or Kassam in some capacity.

BOARD OF DIRECTORS 

 <p>Monty Sikka Co-Founder, Director and Chairman</p> <ul style="list-style-type: none"> Co-founder of Zenabis As President of the Monark Group, has grown the business into a multi-million-dollar, multi-faceted corporation Has extensive experience in e-commerce, marketing and finance sectors 	 <p>Andrew Grieve Chief Executive Officer and Director</p> <ul style="list-style-type: none"> Experienced financial executive, entrepreneur and principal investor (>18 investments) Co-Founder and Co-Head of Advisory at Agentis Capital (>\$20bn in deal experience) Has been an officer in the Canadian Armed Forces for 15 years, where he is currently a Major 	 <p>Leo Benne Chief Growing Officer and Director</p> <ul style="list-style-type: none"> Formerly Vice President and Director of Bevo Gained advanced knowledge of modern horticultural methods at Rijks Middelbare Tuinbouwschool in Holland Provided oversight and management at Bevo in the propagation and floral business for nearly 30 years 	
 <p>Daniel Burns Independent Director</p> <ul style="list-style-type: none"> A lawyer, accountant and entrepreneur Experienced corporate director in the financial services, insurance and mining sectors Has served as chair of a number of significant organizations in Canada and the United States as well as chaired the audit committees of significant public and private institutions 	 <p>Adam Spears Independent Director</p> <ul style="list-style-type: none"> Founder of ac148, an investment company Was a Principal and Portfolio Manager at Anson Funds where he managed multiple long-short equity hedge funds Also worked in private equity at ONCAP Management Partners, and in the investment banking group of Citigroup Global Markets 	 <p>Natascha Kiernan Independent Director</p> <ul style="list-style-type: none"> Experienced international finance and M&A attorney who has held senior positions at several prominent international law firms As counsel at Skadden, represented Fortune 500 companies, financial institutions, and governments in complex corporate finance and M&A transactions totaling >\$100bn in value 	 <p>Larry Van Wieren Independent Director</p> <ul style="list-style-type: none"> President of Van Wieren Developments Ltd., a company focused on land development and international consulting services Was previously President of Van Wieren Canada Ltd, a Canadian subsidiary of the Van Wieren Group based in the Netherlands

TSX: ZENA

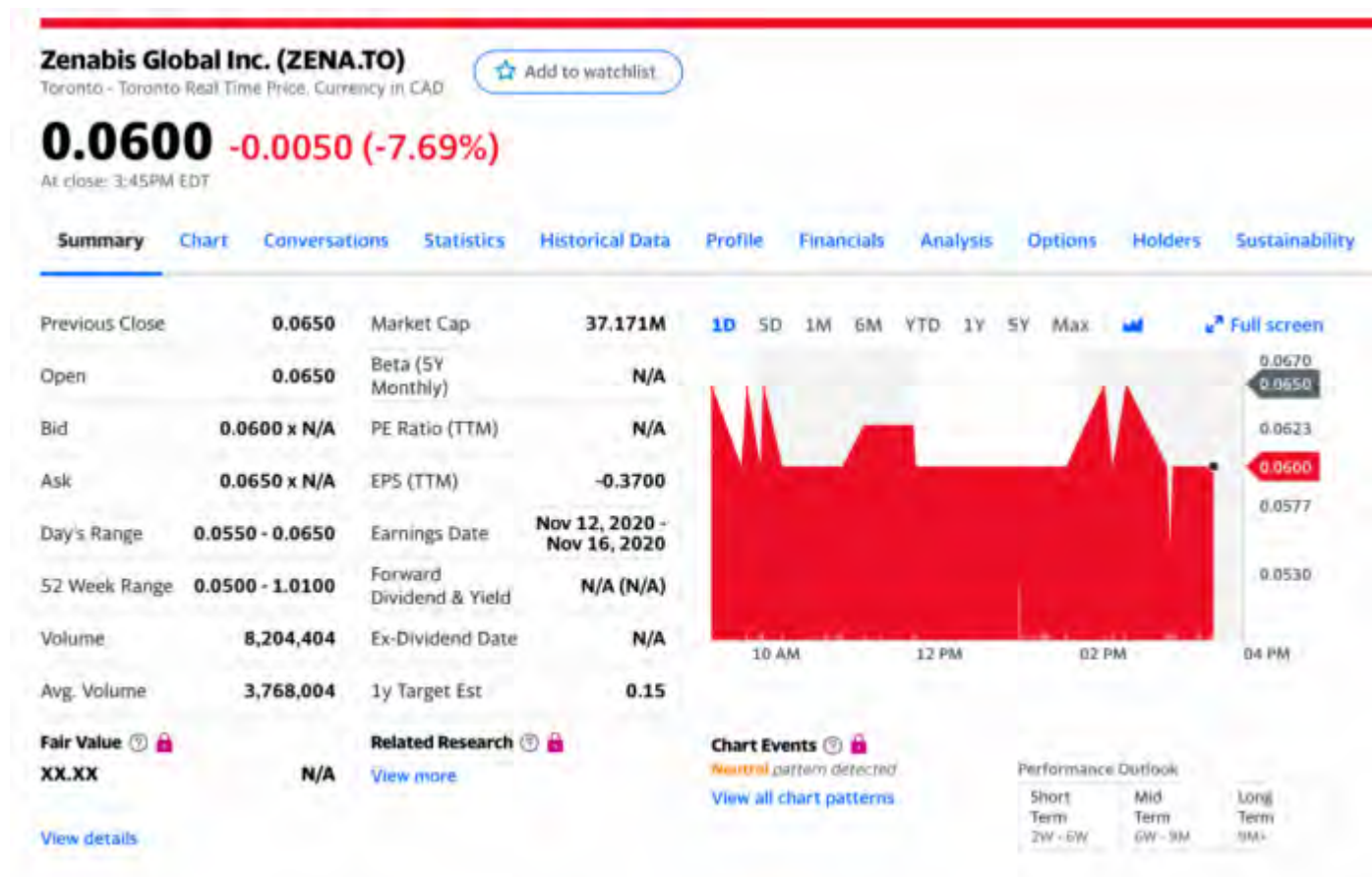
Taking orders from Kassam, Adam Spears convinced Zenabis executives to make their founder shares available to Anson Funds via non-public share loan agreements. Zenabis agreed, including Mark Catroppa, Manoj (Monty) Sikka and CEO Rick Brar.

Rick Brar was easily led on by Kassam and Spears, whom he truly believed were “Long” on the stock and trying to help. Brar didn’t catch on to the background game here that intended to short Zenabis stock to the bottom, making Kassam rich.

Kassam’s first step was to convince Zenabis to go public, which was part of the deal for Anson Funds money. They had to guarantee a liquidity event, and indeed, ‘ZENA’ debuted on the TSX.V on January 10th, 2019.

possible valuation. In other words, they convinced Zenabis that they needed to go public overvalued. This created a wildly lucrative scenario for Kassam because it set up a massive downside potential for Kassam to make a killing shorting. Zenabis agreed to all of this despite the fact that Canada's cannabis craze was already at the beginning of the end, which of course Kassam and Spears were counting on.

Anson Funds systematically shorted Zenabis to \$0.09 from the all time high shortly after listing at \$6.75/share, which gave it a \$950m+ market cap.



They completely destroyed Zenabis, taking it from a \$950-million market cap company all the way down to around \$50 million over dinner and drinks.

Kassam and Spears used naked shorting techniques, convertible debt and share loan agreements to make this short strategy worked. Spears fed Kassam MNPI (Material Non Public Information) so Kassam could get the timing right. Sometimes they would attack by spreading news of bad managerial decisions leaked from the inside just days before a planned good news event for Zenabis.

have dinner with Moez and tell all. Moez would cover and then short it back down again,” one source close to Kassam and Anson said.

And half of those bad managerial decisions were advised by Spears himself, trying to direct Zenabis into lucrative shorting territory for Kassam.

The Zenabis CEO, Brar, finally figured out the game, but as we have said before. It was too late.

As soon as Brar called out Spears, Kassam and Anson for their scheme, he was replaced. Then he dumped his shares as fast as he could and started publicly criticizing the company he founded.

So, who did Anson replace Brar with? Certainly, someone sympathetic to their cause. In this case, it was another figure who could easily be made to believe that Kassam was still “Long” Zenabis and had its best intentions in mind. That figure was co-founder Andrew Grieve.



Grieve was a military man in way over his head. What Anson Funds found in Grieve was someone who truly thought that limitless dilution would be the way to grow and fund operations. They easily convinced him to spend, spend, spend to open a litany of new facilities that had extremely shaky supply agreements.

In other words, they convinced Grieve to dig his own grave.

were in control, though their stooge, Adam Spears.

Then disaster struck, the cat was out of the bag and Zenabis had to seek help or die.

They sought “friendly financing” from giant Tilray, which had also been the victim of an Anson Funds scheme (which failed). They asked Tilray for help in fending off Kassam. At the time, that “friendly financing” was referred to as “non-dilutive financing” (\$30 million) in the form of a supply agreement. In reality, though, that \$30 million was just a cash advance that Zenabis failed to fully disclose to its shareholders.

This was death spiral financing, and it ended up being Grieve’s legacy.

Zenabis repaid \$15 million of that “cash advance” with its product. But it couldn’t cough up the remaining \$15 million, which Tilray had to write off. Most recently, the situation lead to Tilray suing Zenabis for \$24 million for which they eventually came to an agreement via arbitration. If they hadn’t, Zenabis would have been forced to file for bankruptcy because it likely would have lost this lawsuit.

On August 5th, 2020, the Company reached an agreement with an unrelated third party and terminated supply agreements for purchase commitments of \$17,425. As part of the agreement reached the Company will not seek reimbursement of an advance deposit the Company had previously provided to the third party supplier of which \$4,934 remained outstanding as of June 30, 2020 (refer to Note 4). The Company included the \$4,934 in inventory valuation adjustments in cost of sales that related to the write off of the advance deposit (refer to Note 5) in its statements of net loss and comprehensive loss. The Company also removed the \$17,425 of purchase commitments (refer to Note 18) from its commitments and contingencies as of June 30, 2020. In addition, the Company paid \$3,683 in cash and \$1,473 in shares of the Company’s Class 2 common stock.

As of our most recent reports, Zenabis only had a total of \$6.7 million in cash and Tilray took half of that.

Zenabis Arbitration

On June 19, 2020 High Park Holdings Ltd. (“High Park”), a wholly-owned subsidiary of Tilray, Inc., commenced a confidential arbitration against Zenabis Ltd. (“Zenabis”). The arbitration relates to certain payments and obligations under a Prepaid Supply Agreement between Zenabis and High Park. High Park seeks approximately CAD\$24 million, as well additional unquantified damages and related contractual relief. Zenabis has indicated that it will be defending the claim. The proceeding is at an early stage.

With Zenabis fully destroyed, and Kassam covering all his short positions nicely, there was nothing left to do but pull Spears as well. Spears resigned from the board of Zenabis on March 23rd, 2020.

Of course, Anson Funds did not publicly disclose its short position on Zenabis throughout the process as they would have utilized several of their dirty short selling strategies. Sources have outlined that Moez has multiple off book structures (3rd party trading accounts) with friendly nominees that provides

a source close to the deals, it was likely through Frigate Ventures, M5V Advisors (Formerly Anson Advisors), Winson Bruce Ross and/or Admiralty Advisors. These other structures would be registered to friendly persons which take instructions from Moez & Associates. Since Moez is seasoned in this space it is unlikely that he would appoint a family member as they need to appear independent.

Send us your information and documents on Moez Kassam and Anson Funds. Do not stay silent. If you have something the regulators and authorities can use please come forwards. We promise 100% confidentiality – your name and details will not be used. Email us at: info@stockmanipulators.com

The real magic here is when the fund gets stuck with a naked short or wants to move liability away from the fund this vehicle would be utilized. Spoofing the market through these accounts is another tactic; and by doing so Moez shelters Anson as much as possible from wrong doing in the process. He basically has these structures to hide short positions or take the fall in the event something goes wrong. Any sort of investigation would unmask who sourced the capital for these vehicles; but more interesting would be the trading patterns that likely mirror or offset the fund in certainly situations. Likely all roads from this would lead back to Anson and associates. It is highly illegal to park naked shorts for a registered fund and the penalties could be quite steep.

This is likely another key part to Anson's web of illegal trading activities and if the Regulators would execute a deep audit of Anson's books and trading blotters they are sure to find material misconduct amongst these structures.

And there was a very specific reason that Moez Kassam targeted Zenabis: He was making up for his disastrous attempt to short much larger Tilray in which he failed to cover his short and lost hundreds of millions in the scheme. He attacked Zenabis out of both desperation and his sociopathic need to play this game in a manner reminiscent of Dostoyevksy's *Crime and Punishment*. Part of the game is to see how far illegal activities can be pushed before the regulators come down hard. That's the exciting challenge.

And it didn't stop with Zenabis, either....

What Moez Kassam Did to Aphria

Moez Kassam was the mastermind behind the Hindenburg short report that irreparably damaged Canadian cannabis stock Aphria – NASDAQ:APHA and also did massive damage to investor confidence across the entire cannabis sector. It is understood that Moez financed the short report by paying an estimated \$300,000 USD to Nate Anderson. However, Moez felt that he put Nate on the map with this pick and that Nate had made too much of a profit on the trade so he only partially paid the agreed amount for the report.

Aphria shareholders lost big, and Moez Kassam made a killing.

Kassam was a large holder of Aphria stock. He was “friends” with management, wining and dining them and showing them a good time.

But the folks at Aphria were blindsided by Kassam’s friendliness and generosity. Kassam talks the talk and expertly, but he’s a sociopath with an agenda. He set Aphria up for a huge fall and betrayed his new “friends” at the first opportunity.

While he was courting his Aphria friends, Kassam nearly lost everything in a failed short campaign against Tilray. He lost \$80 million, and his friends and colleagues at Aphria would pay the price for that. But what made him do this many have asked? The discussion amongst his inner circle is that Moez was upset with the founders as the company failed to execute a large deal with the Altria Group (MO:NYSE). He laid blame on them and was set to make them pay. It was a tsunami of damage for anyone that got in the way of this attack, but Anson made a killing on all fronts.

The betrayal starts with Nate Anderson of The Hindenburg Report. Kassam started feeding him sensitive, insider information that he obtained from his friendships with Aphria management and founders – sprinkled with exaggerated lies to help his story along.

Kassam attempted to cover his tracks and remove any connection between himself as the insider leak and Nate, as the publisher of the Hindenburg Report. That’s where another figure that even makes bottom feeders look appealing comes into play: Sunny Puri, who created the distance between the two and did all the dirty legwork.

beginning of the end for Moez, and everything since then has been an act of desperation.

Kassam's Anson Funds slinked its way into Tilray in the initial funding rounds when the stock was at \$3 a share. But then he got greedy at the height of the first cannabis blitz, and with Tilray being the first to be offered up on the U.S. exchanges for American institutional investors, the stock flew.

When Moez gets greedy, he gets short—and he's usually naked. He started shorting in July/August around the \$40-\$50 range.

According to our sources, all former members of Kassam's circle who have since disowned him, the "Toad of Bay Street" went for a naked short with a small borrow, betraying Tilray without blinking. This is pure greed with absolutely zero sense of loyalty.

But then Tilray ran to \$120 and people on the street became aware that Kassam was dangerously short, possibly to the tune of 1.5-3 million shares.

And it got worse: Tilray kept running into the \$200's and TD bank (usually excited to facilitate Kassam) threatened to pull his lines.

Moez and Anson punched way above their weight with Tilray and the scheme nearly ended the fund as their shares were restricted until early 2019. By September 2019, rumor had it that Anson was desperately entering into private stock sales to raise capital while the stock was well over \$100.

In the fall of 2018, Kassam had several meetings with Anson's prime broker to discuss their liquidity crisis: In other words, to grovel. The grovelling bought Kassam time to raise capital to hold his short position and hope for a decline.

The real question is this: How did Kassam stop TD from pulling his lines and enforcing the large capital calls against a position that should have ended his business?

Buying time can't be free, and TD would have been playing with regulatory fire here. Anson's huge naked short position, after all, represented a massive credit risk to TD Bank, yet Kassam continued to leverage his relationships there to avoid any major buy-ins. (In

Furthermore, the bank managers of this naked short position and margin calls would have certainly seen numerous securities violations as every favor imaginable would have been utilized to protect the fund's solvency. If regulators catch up to the brokers and banks involved in this episode, the scrutiny could be dangerous for a lot of people – and Moez certainly wasn't worth it. Especially with the regulatory fire that will be coming his way soon.

The first stop on his desperate road to recovery was Zenabis.

Genius Brands International: Illegal Pump and Dump

Rumours are Moez made north of \$60 million and has just paid himself a huge bonus (off the back of the GNUS investors he burned) which he is looking to spend on a \$10-million lake house in Muskoka. **Good times.**

A strategic plan was initiated by Anson Funds to make the stock price adhere to their long-short rule of “Elevator up, Stairs down” with the addition of a ‘safety net’. They would do all of this while giving GNUS and regulators the impression they were LONG the stock.

In other words, the decline in GNUS stock price needed to be slower than its ascent, giving the impression they weren't involved in the pump and dump via shorting the stock. The

In early June 2020, out of the blue, social media pundits start calling Genius Brands the next Disney. But this wasn't your typical short squeeze like everyone thought. This was Kassam setting up his manipulative Long-Short strategy by creating unsubstantiated rumors, according to our sources close to Anson. GNUS turned into the most popular stock added to Robinhood accounts during the first week of June. The move created the liquidity demographic required to cover Anson's and other associated short sellers' massive positions.

When GNUS stock was peaking above \$8+ USD a share, many investors will recall that some anonymous pumpers on social media were speculating that Genius Brands cartoons would become *more popular* than Disney's.

On June 5th, at the peak of the GNUS share price madness, Hindenburg Research (Nate Anderson) entered the picture on cue. Hindenburg is a prominent short seller, and according to a lawsuit filed by Catalyst Capital, it has a direct working relationship with Kassam's Anson Funds. But Nate Anderson does actually have some credibility, not like Moez Kassam and Sunny Puri, so he still has a chance here to save his reputation.

They are all members of a short-selling group that has become known since the [Catalyst Capital lawsuit](#) as the "Wolfpack Conspirators".

Nate Anderson, of course, has denied the allegations, but we know from multiple sources that he is directly associated with Anson Funds—even if he's regretting any such association at this point. The pattern is clear to see without source confirmation: The days before the Hindenburg report on GNUS was published, significant short positions were taken by Anson Funds and/or its associates.

And to the outside world there is perfect cover: In his report entitled 'A Bagholder's Guide to Why We Think Genius Brands Will Be a \$1.50 Stock Within a Month', Nate Anderson argues that the GNUS-Disney social media postings included a bunch of falsehoods. He even suggested that investigators dig deeper into a situation that Moez Kassam manufactured in the first place.

That marked the beginning of the end of the GNUS pump campaign.

Disclosure Agreement, but NDAs have never bothered Moez Kassam.

All the while, GNUS' financials were only shaping up to be even worse in the coming quarter. Anson seemed like a safety net, but it was a trap.

Anson Funds slunk out the back door and communicated to Nate Anderson the tidbits needed to create a comprehensive activist short report.

The first tidbit was that *Llama Llama*, Genius Brands' most popular show, ended up showing that the company doesn't own intellectual property and only has a licensing deal—none of which was disclosed to shareholders.

The second tidbit was the fact that GNUS failed to disclose that its flagship show, *Rainbow Rangers*, was not renewed for a new season on key network Nick Jr.

While some public information backed these assertions in the report, both tidbits were merely supplemental to the key information that was original leaked by Anson Funds itself, with the intention of making money on the short sale.

It didn't help that GNUS insiders, were blinded by greed to Anson's intentions. GNUS management was more interested in filing a prospectus statement that sought to allow holders, including its CEO, to sell almost half the shares from a prior \$11m convertible debt at a \$0.21 strike price before the pump ended and dump was fully completed.

They were purposefully trying to time the release of the statement to coincide with Genius Brands' launch of the Kartoon Network on June 15th. Anson Funds was likely made aware of this plan by insiders prior to the filing.

But GNUS was willfully blind to the fact they had a fox in the henhouse.

Send us your information and documents on Moez Kassam and Anson Funds. Do not stay silent. If you have something the regulators and authorities can use please come forwards. We promise 100% confidentiality – your name and details will not be used. Email us at: info@stockmanipulators.com

While Nate Anderson is unlikely to have been compensated directly by Anson Funds for authoring the report, loyal investors will be wondering why Hindenburg would risk

answer is simple: Nate did it because of the promise that Anson Funds would continue working with Hindenburg. In other words: Easy Money. Nate Anderson is given well timed and gift-wrapped material that allows him to publicly bolster his track record. Giving Nate Anderson an inside track to compile impactful short reports that usually take months to compile in just days. That's exactly how it worked with GNUS.

But then, on July 6th, came the real coup orchestrated by Anson Funds:

To lend a bit more credence (and liquidity) to the fabricated rumors, GNUS announced that it had inked a deal with Stan Lee's POW! Entertainment to create *Stan Lee Universe*, a joint venture that would assume worldwide rights across media to Lee's post-Marvel intellectual property.

Anson took this much further.

Anson even put together a fake Disney Lookalike site so people would think the news was real, as can be seen here: www.DisneyGuide.com.

Then, Anson started claiming that Disney was going to acquire a 5% stake in POW! Entertainment for an undisclosed sum in this report: <https://disneyguide.com/f/disney-is-set-to-buy-a-5%25-stake-in-pow-entertainment>

That rumor has seen been removed from the blog post, presumably at the request of Disney or Anson covering their tracks.

If pressed with such allegations by regulators, Moez Kassam's defense is straightforward and backed by well-timed filing statements. According to the latest filing, Anson Funds Management LP has an ownership interest of 17,857,143 shares. They remain long and strong and show no public quarter-to-quarter filings of being short GNUS. Anson Funds can argue publicly they are still strong and haven't sold a share. This is unbelievable

Given all the FUD that transpired around GNUS, it's unfathomable that Anson Funds wasn't short GNUS stock.

As of July 31st, there was short interest on GNUS totaling an estimated 24,380,000 shares. With Anson's long position secured and intimate details of the incoming quarter, Anson Funds had the safety net required to create a win-win situation for Moez Kassam.

The evidence is clear: GNUS latest filings were disastrous. The company reported a \$383-million loss on just \$560,000 in revenue for the quarter ending June 30th.

The Toad of Bay Street—dipping his webbed feet precariously into SEC waters—rode GNUS all the way up and then shorted it all the way down – disgusting.

Moez Kassam's Facedrive Fumble: Another Act of Desperation

In May of this year, Kassam turned his attention to a Canadian start-up called Facedrive—and failed again, just like he did with Tilray.

Moez got caught with a huge naked short again, and this time it's rumoured to be in the 2.5 to 3 million share range. (How is this possible when the float is around 4 million shares? TD/CIBC/RBC – any ideas?)

After racking up a huge short position, Moez panicked. Hoping to drive the tightly held stock down, he turned to one of the few friends he has left—Sunny Puri and the always-ready-and-willing Nate Anderson at the Hindenburg Report again.

Sunny Puri – would you trust this man?

It wouldn't have been cheap. In fact, sources say Moez paid upwards of \$300,000 for a rushed report—the trail for which regulators should be looking among offshore structures. When a report of this nature is paid for, it is a legal requirement to disclose the details of the transaction.

Moez paid top dollar purely out of desperation for a poorly written, poorly researched report that failed to generate the negative action Moez needed to avoid losing what remains of his fund. Of course, the same sources say that Moez failed to disclose to Nate the true size of his short position, leaving Nate out in the cold and promising never to work with Moez Kassam and Anson again.

Not only that: Moez ran to his hedge fund buddies and begged them to short Facedrive, as well, promising them that the Hindenburg report would send the stock down to \$5 (it didn't) and they could all cover and make tons of easy money.

He also called the head of a Canadian Bank trying to get the prop book to take a short position in Facedrive. When does a hedge fund hand out free money to outsiders? Never. That was the story he sold to Nate (Hindenburg), too. And it's not the first time Moez has burned Nate, so perhaps the lesson has now been learned. (Nate Anderson will keenly remember NTAR. Moez Kassam used him in that scheme, as well. Without Nate's report – Moez/Anson would have had to take on another huge loss.)

and others? **(UPDATE: We recently heard that Canaccord have pulled the plug on Moez and Anson Funds and no longer want his business. Hopefully the other banks will wake up soon and realize his fees aren't worth the risk they come with.)**

According to sources involved in the Hindenburg report, Moez lied to the banks, telling them that he had a large part of a prior placement at \$9, which would have meant he was illegally selling stock he already owned. Instead, the sources said, he had failed to get his hands on a single share of FD. Rumors on the street suggest the same.

In addition to this Moez was telling people about the short report days before it went out, telling people to short and gloating. Now I'm no expert but this is insider trading. Thankfully we have evidence of this which is winging its way to the regulators.

And Moez is truly desperate now, and most likely just lost another "friend".

Facedrive and its shareholders should now be prepared for another assault out of desperation, as well as comments and "reports" by "The Friendly Bear" (AKA Moez and Sunny) and Andrew Left of Citron Research and their friend on Reddit: u/mnkaTHEkid. He's desperately trying to drive this stock lower as his first swing didn't do the damage he had hoped. So now he has resorted to something just as illegal and is being helped by the banks. Which is one of the reasons why their stock has been hit so hard the past 6 weeks – they don't stand a chance and what is taking place makes a mockery of everything the capital markets are supposed to stand for.

According to a source with direct knowledge of Kassam's banking relations, TD, CIBC, RBC and others are playing this game for Anson Funds using ghost bids and offers. They make huge commissions from funds like Kassam's because the risk is extremely high. The system is designed so that only the ordinary shareholders suffer whilst Moez gets away with a wink and a grin, taking advantage of the system and the banks yet again.

Here is an example of how the banks are illegally helping Anson Funds on their Facedrive short: On the morning of July 24th, TD put an offer up of 75,000 shares of Facedrive at \$14.16 (all out in the open). This wasn't a real order, though. It was there with the sole intention of spoofing the market. Then, two minutes before the market opened, it was

and over again.. Our advice to Facedrive is simple: Run a 60-day due diligence investigation on trading activity in your stock and you'll get what you need to put a stop to it. The regulators will be more than happy to be handed such evidence. As of the time of writing (Sept 24th, 2020), there is plenty evidence of fraudulent market spoofing. **In fact as mentioned above over the past 6 weeks Anson and their banking partners have manipulated Facedrive stock down to it's current level. Even a chimpanzee could figure out what has been going on.**

This is the type of behavior regulators love to penalize. In fact, K2 & Associates Investment Management was [fined for doing this exact same thing](#).

This is a scheme Anson Funds has often used to manipulate the market into thinking there was a large seller nearby.

Regulators – you just need to look at all market activity in the stock since May and you will spot the pattern very quickly.

Is Moez really worth it to the Banks – are his commissions worth that much? Surely they know he has absolutely no loyalty and will roll on them in a heartbeat.”

Regulators, Pay Close Attention

times of desperation like this, he gets reckless and makes big mistakes, and those mistakes have been mounting since the Tilray debacle.

Canada has had trouble with naked short sellers in the past, but Moez Kassam has not only crossed the line—he has become the very symbol of the murkiest side of illegal, naked short-selling.

According to a source with insider knowledge of Moez Kassam’s deals, the illegal activity goes down in three areas.

The first is maintaining and managing the naked short positions, which involves a lot of juggling, multiple entities, and countless trading accounts.

The second is illegally front-funding private placements and paid for short reports which are never disclosed.

The third is the planting of moles or befriending management inside a company they are planning to short. He then offers a partnership via capital or advisory services to place the company in a vulnerable position. Very often he will use the non-public information to his advantage and inflict severe harm to the company whilst profiting handsomely himself.

Naked Short Movements

The math is where it gets fuzzy. When Moez is moving short positions, at times he’s getting trading desks to mark them long. According to a source close to Anson Funds, Kassam

sale and it would knock it down. This way he does not need to disclose the short position.

He pays such huge commissions to the banks and brokerages that they let him get away with illegal behaviour. He gets leeway because of the fees and then when he runs out, he buys a little back and puts it back at another one, ending up with accounts at every desk on the street.

In other words, he's robbing Peter to pay Paul. He shifts the short position from firm A to B to C, etc...

Front-Funding Private Placements

Moez Kassam shorts companies before private placement financings and then covers using the stock he received from the placement. He front-funds the private placements as he gets people to tip him off when the deals are coming. This is where it gets murky, the banks need Anson's large lead orders on these small financings so they often make him aware of the raise so that they can structure the deal around his order. Many investment bankers and traders are bringing Moez over the wall on a regular basis and it has become common practice for many smaller firms. This generates large fees for the firms and greed is getting the best of all involved. With this special treatment Moez and Anson take full advantage of these opportunities as there is limited downside. Once tipped off about a financing the fund will start shorting to build a position that will be covered via the offering. By doing so they maintain constant pressure on the stock which inevitably lowers the financing price. It's a win win for them.

Bankers, sales persons and traders all look to bring these opportunities to Moez as they make profits off the large commissions generated from his orders. Moez has all of Bay street desperately trying to feed him information so that he will keep generating fees. This type activity is highly illegal and inflicts serious harm upon the Canadian Capital Markets and its investors. Mom and pop investors are run over by this freight train. If the regulators were to do a detailed audit of the fund and feeder funders as it relates to participation in financings it will be very obvious what is going on.

Finally, Moez Kassam deals in insider trading. He finds a company that is desperate for money and preferably has a weak CEO. Then he pretends to go long, dangling cash in front of them, and shorts them on the side, according to a source who has had numerous dealings with Kassam.

He only needs to be short 10 days to make money on a private placement because they're all doing private placements at a discount. He gets his free warrants so he can short the stock more because he has a security blanket with those warrants. It's a win-win for Kassam, until he runs up against a company like Tilray.

They've never questioned another one of Kassam's tactics, which is to pre-empt an investigation by going straight to the regulators himself. He sends letters and expounds half-truths to them, requesting investigations on his behalf. A good case in point is psychedelics company, SHRM, which was shut down partially on Kassam's insistence and rumor has it with back-up support from VIII Capital and another bottom feeder by the name of [Winston Miles](#). (The regulators can find some interesting things if they dig around Winston's dealings).

Winston Miles and Moez Kassam are good friends and fellow "foodies", but their relationship runs much deeper. Both are driven by the almighty buck and the love of the game. Both will cut any corners necessary to line their pockets. Winston, better known as "Trader Tony", is often found kitchen side at many of Moez's extravagant food-themed parties. In fact, here is Winston in all his glory at Moez's swanky Muskoka cottage. Gorgeous.

(Important note. This was on Moez's Instagram page and look who is copied in: Sean Kallir of HGC funds. This is a young Portfolio Manager whom Moez is grooming for part of the short cartel. Might be something there worth looking at as well regulators.)

Winston is yet another cog in Moez's wheel of capital market crimes and fraudulent trading strategies. Winston is the head of Institutional Equity Sales at VIII Capital, and Moez Kassam and Anson Funds take full advantage of the flexibility that comes with this relationship.

However, @tradertonny and VIII Capital may have crossed a red line here.

Is Winston pumping stocks through the firm's client base to generate higher prices and liquidity in order to allow Anson to build a short position? It seems like this is quite possible; and given their relationship it would not be surprising.

internally and externally to profile small-caps that he considers to be a 'BUY'. But is this done with good intentions? If successful, he moves the price higher and increases liquidity that would allow for his pal to take full advantage and short these very names. It appears that Moez and Winston might have their own mini pump and dump strategy in hand—ripping off investors and enriching themselves.

Now, regulators, PLEASE TAKE NOTE. Winston is currently recommending a small gold company called Tembo Gold -TEM.

He has put together a nice little report and is getting many of his clients to buy into the story. Below is a copy of the messages he has sent out to some poor suckers (sorry, clients of VIII Capital) on the 18th September.

[Click here to read Winston's mail to his clients](#)

Now as you have read above this is a classic Kassam setup. While Winston's clients are buying, Moez Kassam and Anson Funds are going short all over the street. It looks like Winston's little pump took the stock up to 0.20 and at time of publishing it's sitting at 0.15. A nice 25% loss to date for Winston's clients. Of course they will try and hide all evidence of this and hopefully a few players on the street will help put a little squeeze on these folks and make Winston's clients something in the end.

Regulators please take a visit to VIII Capital and look at the phone, email and trading records of Winston and his dealings with Moez Kassam. Interesting things will be revealed here.

Finally, Kassam undertakes elaborate social media swindles.

The Social Media Swindle

When Kassam goes short on a stock, that is when problems start happening for the company and it usually begins on social media and the various online communities. Kassam and Anson have been in trouble before with authorities for manipulating social media and even having a team of people to spread lies and manipulate stocks. This was shut down and he was apparently fined and promised never to do it again.

Texas. Not least because of the fake news using Disney as bait to pump and dump GNUS (mentioned above). The SEC won't like it at all, and if they weren't paying attention before, they are being made aware now as his actions have hurt tens of thousands of U.S. investors and need to be investigated.

In the meantime, regulators should be looking at Moez Kassam's relationships with Andrew Left of Citron Research, Winston Miles with VIII Capital and Nate Anderson with the Hindenburg Report. They do cover their tracks quite well, but they also have loose lips in public. What is often an open secret on side streets eludes the regulators. They just need to know where to look.

That's the end of part 1 – disgusting stuff. But part 2 is even worse as we look at 3 ongoing short positions Anson are currently running, more illegal behaviour and more info on Sunny Puri and Adam Spears. We also look at their partners – the broker-dealers who are facilitating all of this manipulation and how they are breaking the rules and laws to make Moez and themselves money. The capital markets are not free and fair and we will be providing documentation to show this. We will be naming names and believe us there are a lot of them. PI Financial – you have been very sloppy.

The Match Man

P.S. Please do share and re-publish wherever you can – always good to get news out far and wide.

Here is a hotline e-mail for people to come forward with information and documents info@moezkassam.com – Do not stay silent. If you have something the regulators and authorities can use please come forwards.

We promise 100% confidentiality – your name and details will not be used. Just the information you have.

Lets clean up the capital markets.

Tags: Moez Kassam stockmanipulators



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Capital Market Crimes

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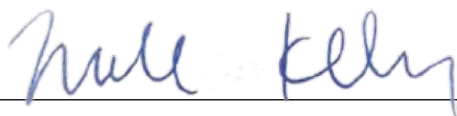
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TAB 2K

This is **Exhibit “K”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Paul Kelly", is written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

Market frauds

Moez Kassam & Anson Funds Part II: Rotten To The Core

📅 JUNE 28, 2021 ✎ ADMIN 💬 LEAVE A COMMENT

Note to all readers: The Canadian regulators (OSC and IIROC) are asking people for information on illegal trading strategies. If you or a company or investor have been hurt by Anson Funds please do not remain silent. Get in touch with the OSC and file a formal complaint. This really is your only chance to be heard. Make it count! You can also send information to the SEC here: <https://www.sec.gov/whistleblower>

You can find their release here: https://www.osc.gov.on.ca/en/NewsEvents_nr_20201001_osc-and-iiroc-appeal-for-tips-on-abusive-trading.htm.

For those of you that never got a chance to read the first report, you can do so here: <http://marketfrauds.to/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

UPDATES:

- OSC begins a full investigation into Anson Funds business practices (according to sources inside Anson)
- SEC begins an investigation into Anson Funds business practices (according to sources inside Anson)
- Moez starts moving his personal funds to the Middle East. Authorities should find the trail easy to follow as he has been sloppy. The trail starts in Dubai and the UAE. He moved over \$20 million USD.
- A Reddit thread everyone should be reading, sharing and adding to: <https://www.reddit.com/r/BurnedByAnsonFunds/>

Here are contact details for the regulators if you have any information or have been hurt by Moez and Anson Funds in any way. They are aware of Anson and your information would be very helpful:

OSC – inquiries@osc.gov.on.ca

BCSC – inquiries@bcsc.bc.ca

IIROC – whistleblower@iiroc.ca

IIROC – businessconduct@iiroc.ca

SEC – <https://www.sec.gov/tcr>

Help@sec.gov

Dallas SEC – dfw@sec.gov (Anson Funds have an office here)

Unitholders in Anson need to wake up and should be asking about the SEC and OSC investigations into Anson Funds. (You need to understand the severity of the questions that led to the head of their Dallas office resigning and Moez moving his personal funds abroad.)

Crime does pay, sadly.

According to rumors spread by Moez, Anson had a bumper year in 2020. They managed 45% outperformance – \$1billion AUM — and Moez Kassam takes 90% of the bonus pool. A good year, indeed. (In fact, he is telling everyone on the street that he took home a \$60-million+ bonus for last year). That feat required destroying a fair number of companies and causing thousands of regular shareholders to lose their savings.

The justification for destroying companies at will and decimating the savings of regular people is that the world needs short sellers. The reality is that short sellers could be the protectors of the retail investor, but they are not. This is about pure profit—absolutely nothing more—at the expense of companies that are never given a chance and retail investors who have no idea what's about to hit them. It is a much more sophisticated form of an external pump and dump. The game isn't to expose companies that are mismanaging investor

it's a good company or not. This leaves everyone wondering who to believe when illicit short sellers undermine legitimate ones who do real due diligence.

And Moez Kassam is not just a short seller; he is a naked short seller whose activities are criminal and whose modus operandi is to manipulate the market and infiltrate companies to destroy them from the inside, while violating all short selling laws. He deliberately goes out of his way to ensure that companies fail.

Buying media is key here. Many of you have probably seen the puff piece put out by Bloomberg;

<https://www.bloomberg.com/news/articles/2021-02-09/hedge-fund-anson-goes-big-on-retail-trades-outperforming-peers>.

It's an embarrassing piece of journalism on many levels; not the least because Bloomberg has no real interest in covering a Canadian hedge fund that almost no one in its audience has heard of.

Rumors among our sources on the street in Toronto are that Moez had to call in serious favors to get this written in an attempt to help generate funds to make up for the huge losses Anson suffered in January. The Bloomberg story was meant to help convince investors that Anson was not too toxic to give money to after Moez Kassam's criminal activities were exposed. Moez only comes out when things are really bad—and they are really bad at Anson.

Corruption within The Globe & Mail?

On the media side there have also been numerous reports of corruption within the national Canadian newspaper, The Globe & Mail, which seems to publish a hit piece on every company Anson gets into trouble on or has a very large short in.

This important piece was recently removed from Reddit and all Canadian investors should be asking how a major national newspaper can have such close ties with a hedge fund:

<http://marketfrauds.to/corruption-at-globe-and-mail-mail-sent-to-their-staff-and-regulators/>

And another:

https://www.reddit.com/r/BurnedByAnsonFunds/comments/m8feao/is_there_a_correlation_between_negative_articles/

Now it is unlikely The Globe as an organization is in cahoots with Anson – but the evidence certainly looks damning for a number of their journalist and editors. How far this once great paper has fallen. A thorough investigation and purge is needed at The Globe.

Anson Funds new major target (and a perfect example of media manipulation)

It also appears that Anson have a new target, Reconnaissance Energy Africa. It has been well reported on Reddit by our friends at [Burned By Anson Funds](#), but Reddit succumbed to the Anson bullying and removed the posts. Thankfully nothing ever truly disappears online and we have pulled the original pages from the internet archives. This is important as it shows how Moez and the criminals at Anson think and operate their short and distort campaigns and how they use journalists to sow the seeds for them to “create their own catalysts”: **YOU NEED TO READ ALL OF THESE (then you will understand the mindset of Anson Funds and the ruthlessness of Moez Kassam)**

Saturday May 22 – Reconnaissance Energy Africa is Anson Funds next target – Illegal tactics being employed by Anson

https://web.archive.org/web/20210523001525/https://www.reddit.com/r/BurnedByAnsonFunds/comments/nivrb0/reconnaissance_energy_afr

Thursday May 27 – Is There A Huge Undisclosed Short In Oil Explorer Reconnaissance Energy Africa?

Saturday May 29 – Anson Funds short and distort campaign against Recon Africa (and Globe & Mail corruption)

https://web.archive.org/web/20210530005858/https://www.reddit.com/r/BurnedByAnsonFunds/comments/no09er/anson_funds_short_and_d

Friday June 11 – Corrupt Globe & Mail writer Niall Mcgee about to do a hit piece on Recon Africa

https://web.archive.org/web/20210611180404/https://www.reddit.com/r/BurnedByAnsonFunds/comments/nxm8tw/corrupt_globe_mail_write

Friday June 11 – Anson Funds disgusting plans for Recon Africa revealed – and they are dirty

https://web.archive.org/web/20210611191009/https://www.reddit.com/r/BurnedByAnsonFunds/comments/nxnprb/anson_funds_disgusting_p

Monday June 14 – Exposing corruption: a letter to Globe & Mail and regulators

https://web.archive.org/web/20210614145146/https://www.reddit.com/r/BurnedByAnsonFunds/comments/nzoje0/exposing_corruption_a_lett

also re-posted here with working links:

<http://marketfrauds.to/corruption-at-globe-and-mail-mail-sent-to-their-staff-and-regulators/>

Wednesday 23rd – National Geographic hit piece.

Thursday June 24th – Quite an unbelievable hit piece from Viceroy Research. One of the most aggressive pieces we have seen in a while. The report is clearly not credible but it doesn't matter. This was the big push that Anson and their group needed. The catalyst that would enable them to lean heavily into the stock and drive it down. Most of the selling on the day would have been between Anson and their syndicate members (we have an example of how they communicate with each other below – all done on Whatsapp and Signal) – they would have mixed big lots with small lots to give the impression that retail investors are panicking and selling. This generated real panic among retail who then started to think that that maybe there was something true in the hit pieces and so they started selling as well. Anson then sees their strategy is working and so they put even more pressure on the stock and further down it goes – causing even greater panic among retail investors who sell even harder and on and on it goes.

Anson know the game well. They will soon be following up with more hit pieces and fake lawsuits to exhaust management and shareholders. Even bringing in more volume will not stop Anson (more on why volume doesn't stop short sellers later). Regulators know this and yet do nothing. **This is how Anson keep on “creating catalysts” to attack stocks with.**

This is a perfect timeline of how Anson operate and how they manipulate journalists and the media to create catalysts that they then use to their advantage. This should be enough information for the regulators to actually do something, or maybe ask a few questions as even to the blind it's obvious there is a coordinated attack on the stock and regulators only need to look at the trading patterns on the 24th June to understand the underhand trading tactics Anson are using in conjunction with the short and distort campaign.

Remember Anson Funds do not care who they destroy in their attempt to make money.

Moez's activities over the last 6 months:

To find out what Moez has been up to these last 6 months there is a very good update here that you must read (it is very disturbing):

<http://marketfrauds.to/moez-kassam-has-moved-over-20-million-into-offshore-accounts-in-uae-and-dubai/>

As covered in the above link Moez is moving money abroad in order to get it out of the reach of Anson unit holders who could threaten to sue once regulators find more information on the criminal enterprise Anson Funds is running. The trail is fairly clear and authorities

We have one more very significant connection to reveal between Moez Kassam and an individual with high-level clout in Canadian financial and sporting circles; but please stay tuned. This information is very sensitive and dangerous and we are waiting to reveal it until we have fully completed our investigation of the individual in question, who also has important connections at the Globe & Mail.

Before we get into the meat of this latest report, here are a few updates from Report #1 based on recent events surrounding Anson Funds and Moez Kassam.

Anson Funds Employee Morale:

Things have gotten rather unpleasant in the Anson offices, according to our inside sources who are taking a huge risk by speaking with us anonymously.

Obviously, Moez is not telling the truth to the downtrodden Anson employees who live every day in fear of firing or lawsuits. Moez has even threatened all Anson employees with lawsuits and installed draconian measures in the office to stop leaks from employees. The fear level is rising—fast. At this point, it is becoming clearer that employees will either sink with this ship or be fired, and now the latter is starting to look more attractive than the former.

The OSC has already asked all employees to hand e-mails over and they will find something – there is always something.

There is good information here on what's happening inside the Anson office:

https://www.reddit.com/r/BurnedByAnsonFunds/comments/m8pkop/anson_funds_under_osc_investigation_staff_to_give/

Anson Funds Christmas Gifts:

Regulators should also look at what happened with Christmas gifts for various people outside the fund that Anson uses.

This year, the budget for gifts (for our purposes, bribes) was north of \$1 million—a figure that should be setting off some alarm bells among regulators and tax authorities.

Social media Manipulation:

We covered this extensively in the first piece, but in the past, Anson has drawn regulatory ire for its manipulation of stocks through social channels such as Facebook, Twitter, Stockhouse, Yahoo, Reddit and other platforms.

The rumors are that Anson received a slap on the wrist and a pathetic fine over this and was then told not to do it again.

Well, Anson has done it again. They currently have 3 full-time people who used to sit in a very plush space in Anson's Toronto offices, dedicating their entire day to bashing companies through these various channels. We understand that they do not do this through Anson servers; rather, through mobile routers and VPNs so nothing can be traced. (Regulators are going to have to step up their digital game because this is VPN 101).

We have recently learned that their social media bashing squad has been moved from the Anson offices since they were outed by someone else online.

But they have been sloppy. Anson are well known to fudge their month end and quarterly NAV numbers (regulators) and the bashers are told to go extra hard towards the end of the month. They are supposed to have different profiles for different stocks and never to mix them. But one of their bashers got sloppy in his rush to please Moez. This basher is commenting on both Reco and Facedrive. Ansons two largest positions – where they are deeply underwater on both.

New and old Anson Targets

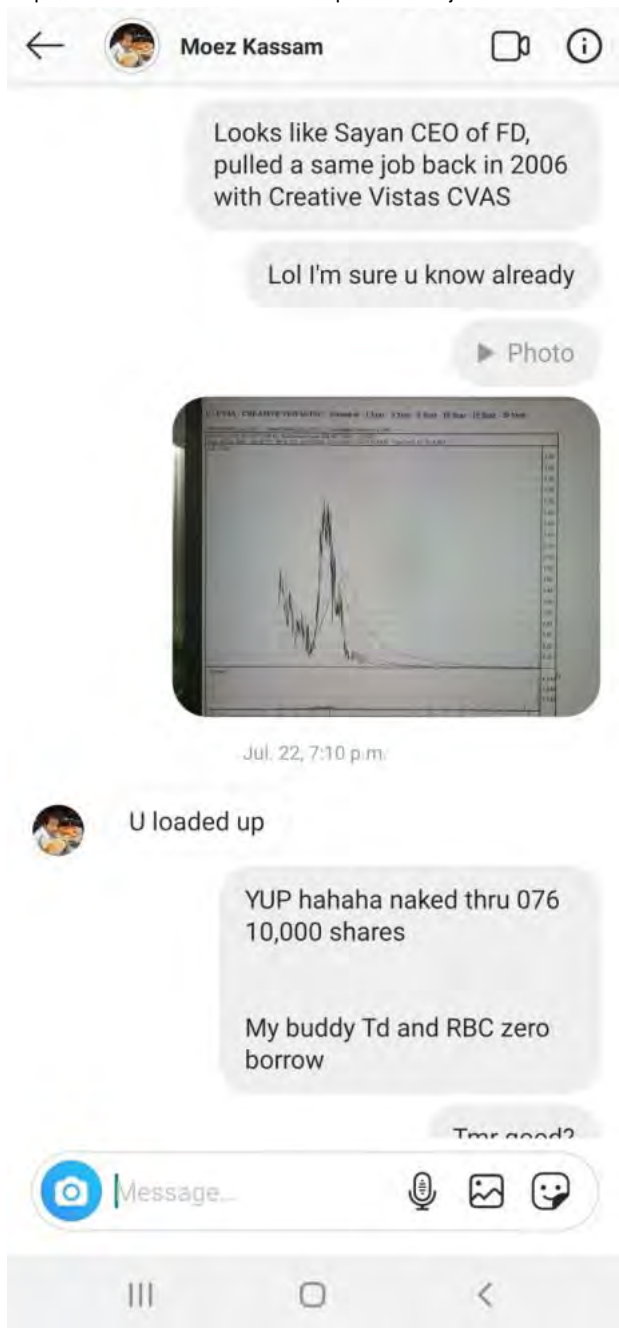
Here are a number of companies that Anson have attacked recently or are still attacking:

Zoom, Facedrive, GSX Techedu (Now Gaotu Techedu), Genius Brands, Gamestop (oops), Reconnaissance Energy Africa, Valorem Resources, Starr Peak Mining, Whole Earth Brands, United Lithium, Mountain Valley MD Holdings, SOL Global, Clean Power Capital Corp, Red White & Bloom, Moderna, Medivolve, AMM Power, Value Line, Champignon Brands and many others.

Facedrive Update

These guys have been coming under a sustained barrage from Anson Funds for over a year now. From Globe & Mail hit pieces to reported website hackings, keyword takeovers in Google and a host of other underhanded and dirty tricks. Moez of course denies that Anson Funds are short any shares in Facedrive. Read the below messages and let us know what you think. GUILTY!







Lets just look at this perfect example of insider trading between short sellers. They are discussing Facedrive and the person on the other end of the message is mocking Moez as [Facedrive had moved against him](#) and his short was proving to be very painful. Moez says to check back with him on Monday. Then on Monday the share price of Facedrive starts falling hard from its high. This was because of the huge amount of paper that was created by short sellers in Anson's syndicate getting ready for a big short report about to come out. Then later on Moez asks if he is loaded up. He responds that yes – 10,000 shares. He asks if tomorrow is good (for the short report being published)

Moez then asks if he sees anything from the big boys. Then on July 23rd a prominent short seller puts out a very aggressive and negative report. THIS IS INSIDER TRADING. Moez knows a hit piece is coming out on Facedrive as he put the whole thing together and is trying to get other traders to go short the stock ahead of time. Regulators – maybe you should confiscate Moez's mobile phone and if these messages aren't there well we know that's obstruction of justice.



Sunny Puri:

This isn't exactly a one-man show. It's important to understand that Moez is not working alone. None of this would be possible without Sunny Puri – Moez's knife man and complete coward.

Sunny is the one who sets everything up, does all the dirty deals and prepares the reports. He is just as guilty as Moez for everything mentioned. (So just to spell it out – all of the hit pieces on your companies are of course arranged by Moez – but Sunny does all of the legwork).

Sunny has recently been in trouble with the police for an incident involving a party (in defiance of COVID restrictions) in which he hired two escorts that he then attempted to swindle by not paying. He is trying his hardest to keep it all under wraps, but it's all over Bay Street by this point, and everyone is just waiting to see if the police will press charges.

Sunny Puri may be just a stooge of Moez Kassam, but we understand that up to this point he has been paid well. He may have recently fallen on hard times, however, leading to his inability to foot the bill for the escorts. Rumors floating around these circles suggest that around the time Moez fled to Dubai, he was beginning to consider Sunny and his crew and other partners useless and may have started to cut them off.

Despite his long-time loyalty to Moez and all the dirty work he has done on his behalf, it would appear that Sunny Puri is no longer the chosen right-hand man. That could end up being a victory for Sunny Puri. If he has been cut off and can prove such with the authorities, he will be spared Moez's fate. The authorities, too, would potentially find in him the ideal whistleblower.

The Heart of the Matter

Where to start ... As most of you readers of [Report 1](#) are aware, we have been having technical difficulties in the form of endless DDOS (Distributed Denial of Service) attacks, believed to have originated from Anson Funds, and bullying legal letters to registrars and hosting companies.

They did not want the report getting out and staying out. Illegal business practices are okay as long as everyone is not talking about them. Once they're out in the open and circulating widely, it becomes a major problem. But word has gotten out, and it's stayed out long enough for people to realize just how toxic this company is. (Just in case you missed it – [here is a link to Report 1.](#))

DDOS attacks are a special form of cybercrime. Ten hours after MoezKassam.com and StockManipulators.com went live, they came under DDOS attack.

The first major attack came from this IP address: <http://99.230.99.190/> – which leads back to this company: <https://www.digitalfront.ca/> (an SEO company from Mississauga, Provider: Rogers).

accusing them, as IPs can be manipulated fairly easily and are far from proof of guilt. Additionally, it is possible that a single individual from within the company was paid to launch the attack off books. Regardless, it's worth further investigation by the authorities. Cybercrime is serious.

After being taken offline illegally, the sites were then shut down after legal threats were made to the registrar of the domains. That forced us to relocate the stories to new addresses, which then also came under heavy attack. This time, the hosting company received threatening legal letters and sadly relented.

Bullying and intimidation is the standard MO of Moez Kassam and Anson, and it has served them well in the past as they destroyed hundreds of thousands of shareholders' portfolios.

But then Anson took things one step further. In addition to hosting the articles ourselves, we also put them on the internet archives ... <https://archive.st/archive/2020/10/marketcrimes.ws/s6yi/marketcrimes.ws/2020/10/02/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/index.html>

This site came under DDOS attack for 2 days on October 8th and 9th.

We also understand from the hacker community that Anson are offering a reward of US\$100,000 to anyone who can bring the site down as their team aren't able to.

Who is paying for all this?

Anson is desperate to stop the truth from coming out about their criminal organization and CEO, Moez Kassam. The expense of launching attacks of this size and which are still ongoing and increasing in their severity is enormous, potentially in the millions of Dollars, and investors should be asking who is funding this operation? Are unit holders footing the bill for these attacks?

At the same time, Moez released a recording saying he had top investigators around the world looking for the writers of the report.

Here is the video: <https://twitter.com/bettingbruiser/status/1322189255632953345?s=21> – a few questions come to mind here.

When Moez says "we can afford it" – what does this mean? Does it mean Moez, personally? Or, is he spending investors' money on lawyers, investigators, and hackers (who are expensive) as there is no corporate money? Will this be coming out of G&A expenses? Has Moez informed investors? Will he be using other people's money to defend his own illegal deeds?

Ordinary people Crushed by Anson

Also during this time, we have received an outpouring of messages from ordinary investors who have had experiences with Anson Funds. In the messages, the authors describe how they lost huge sums of money (for some, their entire savings) because of the underhanded and illegal tactics employed by Moez Kassam and Anson Funds.

Many ordinary people have invested their hard-earned money in these small companies. Some of those companies may have been doomed to fail from the beginning, but plenty of others were destroyed in a premeditated strategy to line the pockets of Kassam and Anson. Whether these companies would have made it or not is not relevant here – all of them deserved a fair shake at it, to try and make their businesses successful; but now we will never know if they could have been. These activities have undermined investor confidence in the free market and sullied the Canadian capital markets.

Among the many messages and pieces of evidence we have received from our readers since the publishing of Report 1 is a recording made by a source who had dealings with Kassam personally.

Moez Kassam voice recordings:

Moez Kassam Soundbite 1

"A lot of times if I'm working with Ben Axler (Spruce Point Capital) or doing this kind of stuff then we can create our own catalysts right because we're putting out a report. So I know when stuffs gonna go down and I'll buy puts. It's very easy to know...a lot of people know when something is coming so they'll buy puts and you know he makes 50 puts per day so I'll make 2000 trades today and that hurts the stock the next day when the report comes out."

0:09 / 0:21

Wow – this does not look good at all. Very little to say here. I think we can let the regulators deal with what this means. Fraud, market manipulation – all very bad. How many companies have been the victims of Moez Kassam's "catalysts"?

A recent one that comes to mind is Reconnaissance Energy Africa as mentioned above. Take a look at this thread on Reddit that explains how moez creates his catalysts:

https://web.archive.org/web/20210611191009/https://www.reddit.com/r/BurnedByAnsonFunds/comments/nxnprb/anson_funds_disgusting_p

(This is the archive.org thread as Anson bullied Reddit into taking the post down)

Moez Kassam Soundbite 2

0:04 / 0:04

"I loved what he did on TOS by the way. That was awesome. (Moez) Where do you think all that came from? It's all us. We don't publish anymore." (sadly we couldn't have the recording of the other speaker to protect his identity. But we have listed what he said and the regulators have the full recording).

At the heart of it, Moez is a coward. Anson no longer puts out its own short reports for fear of legal repercussions. Now, the Anson team just does the research and feed it to various stooges out there such as Ben Axler, Viceroy and others who carry all of the risk. These reports always have an element of truth – but are also filled with lies. For example, the GFL report put out by Axler and Spruce Point was all Moez and Anson. He was even bragging about it last summer when he was drunk, commenting on what a bunch of idiots they all were. We don't know if he was talking about Axler for being the stooge or the people behind GFL. (Moez also provided all of the pictures that appeared in that report as well).

Anson regularly engages in wire fraud with other short sellers and writers – so a thorough look at their various entities and where money is being sent needs to be undertaken. Often, Anson will use a "consultant" to filter funds to these various groups (WIRE FRAUD).

Also look to Winston Miles at 8 Capital. He would likely be able to help regulators with a number of offshore entities (British Virgin Islands) he controls (or might have recently shut down).

Here are a few people Moez works very closely with that should be investigated:

1. Winston Miles – Trader Tony: <https://viiicapital.com/institutional-sales-trading-team-2/> – We all know Tony for the bottom feeder he is. As one of Moez's stooges, he gets access to all of the good stuff first. All payments to Winston need to be looked at closely. He also has some British Virgin Island entities that need investigating. You will find some very interesting payments here.

2. Ali Zamani – Used to work for Anson Funds and recently resigned. He knows a lot about their illegal activities in the United States and ran because of what he knows is coming. He absolutely needs to be questioned by the authorities.

Moez Kassam Soundbite 3

"Because we're short a lot of these names I'll still buy into a lot of them, right. If I'm already short I'll buy it (the private placement) to sell to get the warrant. I'd do debt (to equity) with warrants...Every company comes through here, we meet every single marijuana, every single crypto comes through our office. Cos we're writing the biggest..."

0:17 / 0:17

So he buys into private placements that he is short (**don't the regulators have an issue with this?**)

Here's how the shakedown works: You announce a private placement or let it be known that you are interested in raising funds. Anson gets wind of this and starts selling hard. They then have you over a barrel as they know you need funds and at the lower price they re-negotiate and take you to the cleaners. This has happened too many times to count, but regulators should take a look at Harvest Health. Interesting things happened there with Anson in January 2020 – you will see a sudden fall in the share price. Anson and Harvest should be able to provide more details.

Moez Kassam Soundbite 4

"we're making our money on these converts to longs, like converts on the marijuana and I'm short a ton of marijuana and buying a bunch of these broker deals"

0:07 / 0:07

Is this legal? Not anymore and hasn't been for some time.

Moez Kassam Soundbite 5

"So you want to go to the places that are lending out, that's what we do, but it's very hard for retail. We're putting up big numbers and paying massive borrow rates. We're as important to a prime broker as a 10-billion-dollar fund because we're paying 50, 70, 100 for some of these names and no one pays anything"

0:17 / 0:17

What Moez is saying here is that the banks are in on the fraud and market manipulation because they get paid big fees. Regulators should be looking at RBC, CIBC, TD Bank, National, among others. You would have thought they would be more careful following the large fine Scotiabank received.

Moez Kassam Soundbite 6

"And don't mention (to Sunni) that we give the stuff to (Andrew) Left or (Ben) Axler (Spruce Point Capital)."

0:07 / 0:07

Moez lets others do his dirty work for him. He talks a big game but when confronted, he tucks his tail in and has been known to beg and plead, blaming everyone from his colleagues to his father-in-law. Anson were sued once and now he lets braver men take all of the risk.

Moez Kassam Soundbite 7

"We have the luxuries I can at least use these nine different prime brokers and I'm all over these retail guys in the US. All these guys who buy shit so we have all these prime brokers in Florida."

SEC – somewhere for you to direct your investigations.

Moez Kassam Soundbite 8

“You know, I can bring in Sunni to talk about SHAW, we think it’s overvalued, but again like could it affect the stock price? that’s the objective, and Andrew doesn’t work schemes anymore”

0:21 / 0:21

Regulators – time to look at SHAW. It looks like Anson wanted to create another one of their “catalysts” here but Andrew Left refused to work with a bottom feeder like Moez on his scheme. Moez can be heard earlier in the recording talking about how Left has gotten too big for himself following his Overstock success and won’t work with Moez anymore. Moez is hugely egotistical and the fact that someone of Left’s stature refused to work with him would have hurt deeply, hence the bad mouthing.

Now, before we get to the more in-depth research, we also have to comment on Anson’s response to Report no.1.

<https://ansonfunds.com/wp-content/uploads/2020/09/September-30-2020.pdf>

One thing short sellers like Anson and their cronies demand from companies they attack is a line-by-line response to the accusations. However, Anson itself failed to do this. No denials. No line-by-line rebuttal to **Report 1 (Remember please print and share)**. Instead, Anson simply lashed out at its own investors, presumably for already withdrawing funds.

While we do not expect this to happen, at this point our best advice to Anson is to open up their trading blotters to the OSC and SEC if they have nothing to hide. Investors and companies demand answers, and they deserve them..



All Streets Wolf @AllStreetsWolf · Oct 1

Anson Funds rebuttal to the recent exposé & its weak af. No acknowledgement nor explanation of accusations just basically saying the destruction of other peoples holdings was deserved & they wont stop. Going short is fair game but the how is full of grease ansonfunds.com/wp-content/upl...



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September 30, 2020

In response to anonymous attacks against Anson Funds and its leadership:

Any attempt to attack or undermine Anson and its people will not deter us from taking contrary and unpopular market positions when a company is overvalued. It stands to reason that those who engage in illegal pump-and-dump schemes would resort to anonymous attacks and pressure tactics. These are signs of desperation as their



Benjamin A. Smith @BenjaminA_Smith · Oct 1

Anson Funds responds to the **Moez Kassam** calamity which took place this weekend. Don't see much in the way of actual rebuttal of key (or any) allegations. Will be interesting to see what happens with regulators going forward. Nice find [@AllStreetsWolf](#)



All Streets Wolf @AllStreetsWolf · Oct 1

Anson Funds rebuttal to the recent exposé & its weak af. No acknowledgement nor explanation of accusations just basically saying the destruction of other peoples holdings was deserved & they wont stop. Going short is fair game but the how is full of grease ansonfunds.com/wp-content/upl...

But people ARE paying attention. Report 1 caused a major stir on stock forums, and among banks, investigators and, importantly, regulators.

On forums, some have claimed to have known about the alleged tactics of Moez Kassam and Anson Funds for some time, but felt powerless to do anything about it:

**S_Pat** @SPat93570128 · Sep 27

Well we always knew this to be true, but here is a report on how our lax regulations allow short sellers to steal from you and I while killing companies before they start... maybe start by banning naked short selling

**Betting Bruiser** @BettingBruiser · Sep 29

I have been a early voice of concern re: Moez Kassam, Sunni Puri & **Anson Funds**. Their tactics are simply sleight of hand with the gift of gab. I know their strategies very well this article shed some light on them. [#PotStocks](#)

**Leigh Hughes** @leighmhughes · Sep 27

Moez Kassam and **Anson Funds**: A Tale of Corruption, Greed, and Failure – Capital Market Crimes. Absolute garbage what naked short **funds** get away with here in North America!

**WeedStreet420** @weedstreet420 · Sep 27

Must read. Moez Kassam is the symbol of everything that is wrong with capital markets. Here's what really happened with [\\$ZENA \\$APHA \\$TLRY \\$SHRM](#)

No Fear of the Regulators:

The regulators might be interested in knowing that Moez was out drunk before his long trip abroad, boasting about his team of crack investigators, which he claims includes ex-CIA operatives, and a team of lawyers working with him. He declared that he has absolutely no concern whatsoever about what the “toothless OSC” may be planning. He also indicated that he has people inside the OSC on his payroll. Will anyone even bother to look into this?

(And this is what he’s doing while he’s destroying companies and shareholder portfolios: <https://vimeo.com/140274640> – if you can get through the whole thing, we applaud you. (You will all love the soundtrack. This is how he actually sees himself the deluded imbecile).

Kassam truly believes he is above the law, but we are counting on regulators to prove him wrong.

Other updates and information blasts:

Medmen’s Toxic Dealings with Anson Funds

The spectacular rise and fall of Medmen has been well documented by media outlets across North America.

Medmen went public in June 2018 with a valuation that was approaching \$2 billion dollars and at its height employed nearly 1,300 employees. However, before their go-public event, in early 2018 the company was looking to raise additional capital and went to the booming Canadian Capital Markets. It was during this period when Bierman and Moldin were introduced to Moez Kassam of the Anson Group.

The company was having difficulty completing this financing, so Moez gained the trust of the founders and promised a true partnership on the deal. The terms of their arrangement are understood to be that the fund agreed to backstop the needed financing of an estimated \$30-million deal not because they believed in the company, but because Adam Bierman **agreed to assign a very large block of his founder stock to Moez for this commitment**. However, Moez doesn’t like to take any risk so they proposed that so long as the company received the needed funding, he would get the block of founders’ stock. Bierman agreed and Moez hit the street and promoted the story across Canada and the US so that others invested and he would get a free ride on this deal.

holdings in their prospectus for listing.

In addition to this, Anson promised future funding for the company so long as they could front-run any deal and offset their short with the newly created shares. The founders would provide the fund with the needed borrow in advance so there was no buy-in risk for his group.

Upon listing in June 2018, the stock fetched a valuation of nearly \$2 billion and was highly touted by many. They were regularly featured on CNBC, Jim Cramer's MadMoney and many other financial news outlets. The perfect storm was at Anson's door step. A high-flying, mismanaged company in constant need of capital.

Moez made a killing on the way up as he sold out his long position for a healthy profit and shorted in advance of any capital raise. Then, the music stopped quite suddenly. Cannabis names crashed and the fund quickly flipped from an advocate of Medmen to a carnivorous and attacking shortseller, while utilizing the founders' own stock as borrow to press the financially distressed company's share price lower.

GFL:

Moez was out again drunk in the autumn with some folks we know well. He said he was the one who fed Ben Axler at Spruce Point all the information on the GFL short report. Now, this was a report that Moez wanted his involvement in kept quiet, but he and Sunny Puri are the people behind the research, data and pretty much everything else Axler put in his report. He apparently just signed his name to it (according to Moez).

Even though Anson made some good money off the back of this hit piece it wasn't his main objective. Apparently, it was done out of spite as he wanted to hurt a number of people mentioned in the report over some imagined slight.

You see, it's not all about money with Moez. He bears a grudge for any slight or imagined wrongdoing – so this was motivated by spite just as much as profit. We thought some folks would like to know this.

Big win for Anson: GSX Techedu (Now Gaotu Techedu)

Anson has recently had a huge win with a large Nasdaq-listed company called GSX Techedu. Anson had a huge short position at one point. If you include all of the various instruments, they were 18 million shares short. Now you have probably seen a huge number of short reports and bashing everywhere on social media. Yes, that was mostly Anson Funds. The people who put the short reports out were fed the information as always and in some cases promised a % of the profit from Anson's position (Moez never pays – remember this).

Apparently, Anson made about fifty million dollars in profit from their GSX short – well done. I wonder what the GSX folks think about this? Could someone forward this onto them?

Problem trades for Anson:

Zoom, Facedrive and Reconnaissance Energy Africa. All of these trades are hurting Anson badly. Remember they have naked short positions in the latter two stocks.

Banks Moez works with:

He uses a multitude of banks and brokers, but the ones who work with Anson all the time in these illegal schemes are:

- RBC
- TD Bank
- CIBC
- Canaccord (yes Canaccord are back in the picture again – they couldn't resist those juicy commission payments)

- National Bank
- Latimer

Wire Fraud – Illegal payments to analysts and social media bashers:

These are payments made to Analysts and other short selling groups. Unfortunately, we can't post the details here as it would compromise some of our sources.

Marc Cohodes, a famous short seller, made an interesting post on his Twitter thread a little while back:

<https://twitter.com/AlderLaneeggs/status/1397638209979355136>

"The dirty little secret that I will address in my letter to the SEC are the 'balance sheet arrangements' amongst 'the players' which need to be disclosed. I can't wait till one of these 'Activists' get popped by the SEC. 'Marc we need to put food on the table, how else can we do it.'"

I would love to hear more about these balance sheet arrangements. This is something Anson does a lot of and it shouldn't be too hard for regulators to follow. How we understand it is the following.

An analyst/researcher puts together a commissioned short report for Anson. They are then paid in cash and a % of what Anson Funds made from their short position. We believe this is highly illegal. These researchers should be paid out of the management fees and not the fund.

We have multiple contacts that worked with Anson Funds in the past and after their bad experiences there they went to other funds asking if they could be paid on contingency on the trade and they said that's illegal. They can pay out of management fees but to pay directly out of the fund is illegal. Anson Funds are clearly paying their "partners" out of the fund and breaking their agreement with unitholders. This is fraud and the regulators and unitholders need to know more about the balance sheet arrangements Anson have with analysts and short selling groups. We know for a fact they will find some very disturbing things.



Now we are not fans of Cohodes – but he does his research and attacks his targets head on. Not like the Toad of Bay Street (Moez Kassam), who does not have the courage (or *cohonos*) to act this way. Why someone with Cohodes reputation is still working with Anson is a mystery to everyone – even his colleagues in the short selling community.

Anson funds funding has to be investigated: (who are they washing money for?)

In 2008, Moez Kassam began to make a small name for himself throughout the Canadian investment community while guiding his small asset management company that was originally seeded by friends and family in 2007. He drew particular attention as he posted a positive return during the stock market crash of 2008. Yet, during this time, his fund was considered too small to be taken seriously by many Institutional trading desks. Not until sometime after 2010 did Anson begin to ramp up its AUM as the assets began to pile into the fund at an impressive rate.

Several industry insiders began to take notice of its rumored capital inflows, which was met with plenty of skepticism. Ultimately, the size of capital that was being directed at the group seemed to be very abnormal given its performance. Anson posted strong numbers, but not the type of numbers that would attract that kind of support. Moez was not the Warren Buffet of Canada.

Given the group's performance, one would expect to see net inflows of capital; but not the explosion of AUM that it experienced during this period.

Moez grew his fund from less than \$10mm AUM (2007) to \$150mm (2010) to \$500mm, and to a peak of nearly \$1 billion in less than 10 years with **average numbers**. How is that possible, a fellow fund manager asks?

Individuals close to the Anson group sited multiple large investments made quickly after 2010, which caused people to question what was really going on.

This same manager suspected that the fund was groomed and heavily seeded with capital by a large US short fund that would utilize the Anson platform for their own investment strategies and timely trades to lessen disclosures and create separation on certain transactions.

This made a great deal of sense as Moez would get the benefit of the information and performance, while the large partner remained anonymous. Obviously, this would have been structured in a sophisticated way so that it did not attract any scrutiny and appeared to be a natural inflow of capital. Any in-depth investigation will reveal what happened here.

In addition to these investors, it is also common knowledge that Anson had accepted large amounts of capital via Middle East investors. What is the relationship with these groups and did they properly comply with Canadian AML requirements for these foreign investors?

With the illegal trading strategies employed by this group, both the OSC and SEC need to better understand the complicated machine within the Anson shell and where all of their funds have come from in the past.

Zenabis – again:

Muneeb Yusuf, the husband of Anson funds legal counsel Laura Salvatori, facilitated the toxic financing deal between Zenabis and Tilray via Brownstone Advisors, where Muneeb is CEO. An advisory firm taking a fee for putting a deal together is nothing really to talk about. However, this firm hadn't received any fees previously, and Muneeb, the CEO of Brownstone, is married to the chief legal officer at Anson.

This fee without a doubt made its way back to the Anson principals. We have been informed that there is a paper trail of additional billings between Anson and a 3rd party (possibly Brownstone itself) to move a portion of the funds back to Anson. One point to keep in mind is that the fee would have been structured as an advisory fee to avoid any regulatory review if the payment had been considered a commission payment.

Was the relationship here disclosed? This deal needs to be looked at much more closely by regulators because the conflict of interest is pretty clear.

From our perspective, it appears that Anson worked diligently to manipulate the share price to a depressed level only to offer a friendly hand to provide funding for the issuer. Anson specializes in and profits handsomely off of this type of activity. Not only does it book strong profits on the short sale (often naked in some way) but with a structured financing Anson has the ability to flatten the trade and even take a net long position. This allows the fund to take full advantage of the depressed price, which is often profitable as well.

Screwed over his own family

Moez's uncle (his mother's brother) – was a kind man and paid for Moez's university education. He would not be where he is today without this act of kindness from a family member. But Moez knows no family loyalty.

What happened after that generosity was the titling of a property. A property owned by the uncle was held in Moez' name. But instead of handing the property over, Moez made the uncle pay for it again. We have heard the total cost was around \$900,000.

dreams for success. He did it to family. You are nothing to him.

Anson Funds utilize Water boarding style trading tactics ...

At their core, algorithms and programmed trades are a set of steps or instructions that a computer uses to execute BUY / SELL orders. These can vary from very complex instructions comprised of thousands of lines of code to more basic and straight forward rules. Anson Funds have fully embraced this new way of trading and use it to their advantage.

One area that Anson utilize with almost all of their short positions is the abusive use of program short sale algorithms. They use this to create a nearly impenetrable ceiling on a stock that is nearly impossible to clear and prevents the share price from moving higher. For example: Company ABC trades at \$10.00 and averages 500,000 shares a day. A short seller has the ability to place multiple SS algo orders through various brokerage firms that makes it next to impossible to increase the share price in that window. If the seller were to enter 3 separate orders of 150k shares with a lower sell limit, say \$9.80 they have effectively offered a single days total volume to be sold in a slow drip fashion that would surely pressure the share price lower.

These types of orders are easily spotted as they usually show a very small amount of stock on the offering side; between 100 – 1000 shares at a time and continue to reload and follow the market as it moves up or down while making sales along the way. This small train of mini sell orders follow the share price until it reaches the instructed limit. If the intent is to make the shares decrease in value and the stock does not react how the account desired, they can amend the program by either lowering the limit or increasing the size of the orders. (maybe both). In many cases this is suffocating to the share prices as it slowly grinds lower.

Many in the industry have considered this a form of capital market water boarding; and Anson does not let up until somebody gives in. WHO?

Either the company agrees to cover their short with a financing or the shareholder base capitulates and begins to sell their position as it appears to them that there is an issue with company and the stock is performing poorly. They use this laddering approach to bring great harm to the companies they attack.

This kind of activity kills small cap companies. They do not stand a chance against a sustained attack of this kind. **Companies bring in volume and everyone is of the misguided belief that volume will solve the problem – it will crush the shorts. But that is not the case – they just up their short more.** So if they were short 1 million – they just go short 1.5 million. You can see this on the pre-bids too. If you bring in \$1 million of buying in the bid side – they will match it on the ask side.

This strategy is employed once Anson has established a short position and is used to place the stock in a particular range or an attempt to break long shareholders and have them sell their shares at a much lower level where Anson would be looking to cover.

You do not stand a chance. If you have experienced this in your stock and can't explain why – this is Anson Funds destroying your quote and there really is very little you can do about it. A number of companies we have spoken to said they have recorded all illegal trading activities and sent them to the exchange and regulator and nothing has happened. Sadly nothing probably will happen in Canada until there is real political will to make the marketplace a free and fair place to invest and trade.

A perfect example of this is with the small company Medivolve (MEDV.NE). Over the past 6 months Anson have destroyed the quote of this company using exactly the above tactics. They never stood a chance. They have done this to hundreds of other companies as well. Companies that deserved a chance and listed on the capital markets to try and bring their projects to life. But Moez Kassam and his criminal colleagues at Anson Funds destroyed their companies and wiped out tens of billions of dollars of investor capital.

We know for a fact there have been dozens of complaints issued to the OSC, BCSC and IROC and yet still nothing has happened. **Will the regulators ever act against Anson?**

What Keeps Moez up at night

Our continuing private investigation has uncovered new information about how this illegal operation involving Genius Brands (GNUS) was conducted by Moez Kassam and Anson Funds. New emails have surfaced from an individual by the name of Josh Flo (a Minnesota real estate agent) in which he admits to the fraud in which he was used to buy the DisneyGuide.com domain. That is the domain where the fraud in Genius Brands stock took place.

Our investigation also involves a source at a Canadian broker who reveals that Moez Kassam made close to \$100 million profit from his fraudulent Genius Brands trade.

Background: How Moez Kassam and Anson Funds defrauded GNUS investors:

Anson Funds was the driving force behind the manipulative long-short campaign for entertainment company Genius Brands – [GNUS](#).

A strategic plan was initiated by Anson Funds to make the stock price adhere to their long-short rule of “Elevator up, Stairs down” with the addition of a ‘safety net’. They would do all of this while giving GNUS and regulators the impression they were “long” the stock.

In early June 2020, out of the blue, social media pundits start calling Genius Brands the next Disney. But this wasn’t your typical short squeeze like everyone thought. This was Kassam setting up his manipulative Long-Short strategy by creating unsubstantiated rumors, according to our sources close to Anson. GNUS turned into the most popular stock added to Robinhood accounts during the first week of June. The move created the liquidity demographic required to cover Anson’s and other associated short sellers’ massive positions.

When GNUS stock was peaking above \$8+ USD a share, many investors will recall that some anonymous pumpers on social media were speculating that Genius Brands cartoons would become *more popular* than Disney’s.

On June 5th, at the peak of the GNUS share price madness, Hindenburg Research published a report entitled ‘[A Bagholder’s Guide to Why We Think Genius Brands Will Be a \\$1.50 Stock Within a Month](#)’. In the report they argued that the GNUS-Disney social media postings included a bunch of falsehoods. And focused heavily on the knowledge that retail investors were completely oblivious to the fact that 131 million shares and share equivalents issued from GNUS’ recent financing rounds would become available to trade within an estimated 2-4 weeks. And Anson Funds directly and indirectly participated in these financing rounds or advised GNUS in these rounds.

GNUS has generated losses every quarter for almost 10 straight years. Despite this, the self-proclaimed street savvy Anson Funds was GNUS’ biggest institutional investor and supporter for many years.

After the report came out, GNUS stock plummeted, causing Moez to panic because he likes the stairs down approach as it allows him to disguise his actions much more cleanly.

To do this, his team and people linked to Anson created the www.DisneyGuide.com website with the sole purpose of pumping the GNUS stock to stop the slide and make it a more manageable descent.

Our investigation has uncovered that the owner of the DisneyGuide.com domain is a used car salesman and realtor from Minnesota by the name of Josh Flo.

While the authorities are already likely looking into Josh Flo, what they will find is this: An individual who has little understanding of markets or market rules. This individual does not appear to fully understand with whom he was working or the extent of the crime he was committing...

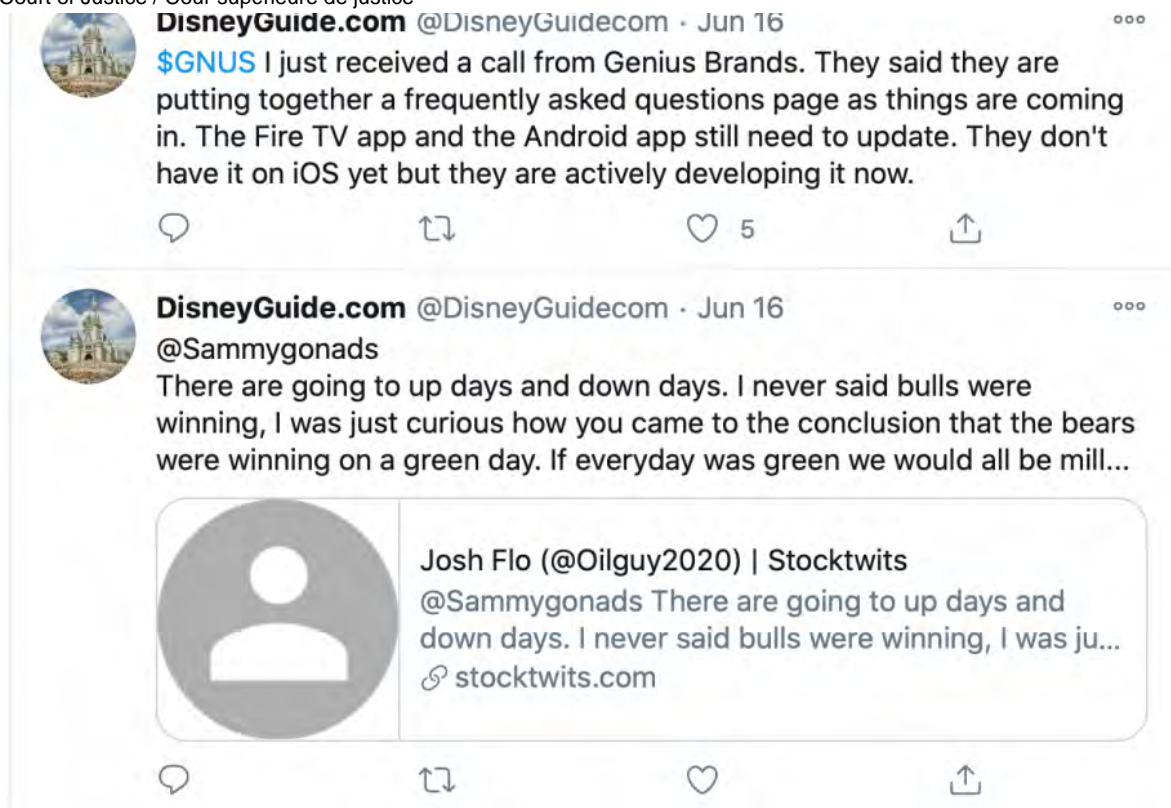
He was most likely simply an instrument used by Moez, and possibly someone whom he came into contact with through a close associate or during an Anson Funds visit to Minnesota when they cut a deal with a company called CNH.

They talked Flo into purchasing the domain and even convinced him to use his [personal Twitter account](#) to talk up the fake Disney news.

[DisneyGuide.com website.](https://disneyguide.com)

Flo started posting on the new Twitter account on June 13th and then stopped on June 16th.





On his personal Twitter, Flo also suddenly shifted from Tweets strictly related to real estate to (last post in 2018) GNUS, with zero explanation.

On June 9th, Flo suddenly posts something about a random oil stock to make it look like he is now interested in equities; and then on [June 11th](#), all attention shifts to GNUS.



On June 15th, he posted the following:

Josh Flo
@JoshFloRealtor
Jun 15
\$GNUS

<https://disneyguide.com/f/is-disney-pursuing-genius-brands-we-are-hearing-rumors>

The link is still there but the contents have been cleaned up ...

The entire social media back-and-forth has Josh Flo talking to himself and commenting on his own posts on different platforms.

Flo has not yet moved to delete his Twitter content, but we suspect that will follow soon when he realizes the amount of trouble he is in.

A Toronto-based source close to Anson Funds has told us that Josh Flo and the DisneyGuide.com website details are the one loose end that has Moez Kassam very concerned. Flo is intended to be the fall guy when the SEC comes knocking, but he is also the weakest link.

If Flo believes that Kassam will betray him as he has betrayed others, Flo may run to the authorities himself to avoid prosecution and turn himself into a whistleblower.

Then we also have Flo's Stocktwits account. <https://stocktwits.com/Oilguy2020> in which a used car salesman and real estate agent suddenly becomes an "Oil Guy".

It is all the same copy that he posted on Twitter in June and then it mysteriously disappeared on June 26th. Fortunately, someone at ADVFN managed to copy the text: https://investorshub.advfn.com/boards/read_msg.aspx?message_id=156225025

Golden_Cross

Thursday, 06/11/20 09:34:47 PM

Re: GoingLong30 post# 5661

Post # 5706 of 9324 Go

Nice Rumor Find GoingLong30....

Quote:

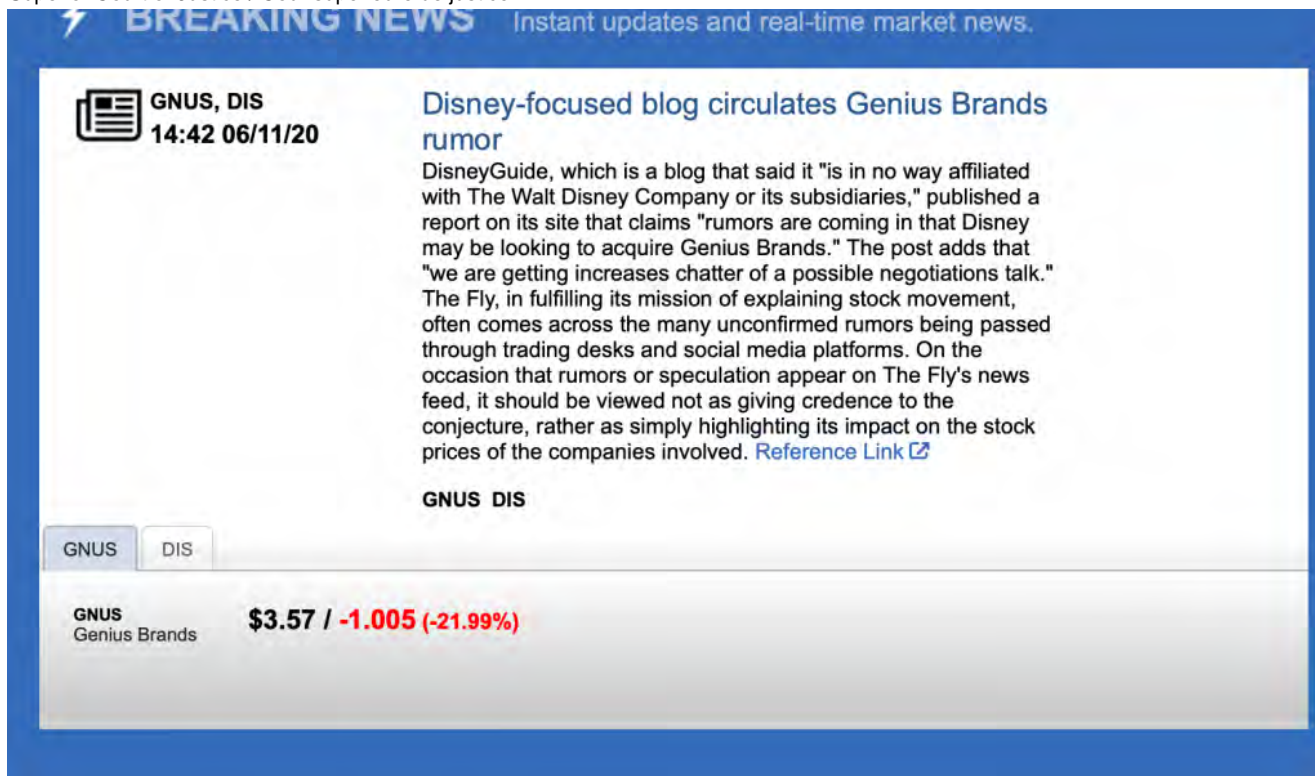
Is Disney pursuing Genius Brands? We are hearing rumors.
June 10, 2020
Disney
Disney

Rumors are coming in that Disney (DIS) may be looking to acquire Genius Brands (GNUS). Although Bob Chapek of Disney and Andy Heyward of Genius Brands haven't made any announcements we are getting increases chatter of a possible negotiations talk. Considering Andy has sold to Disney before, there may be some validity to these rumors. Come to DisneyGuide.com for all things Disney and updates on these rumors.

<https://disneyguide.com/f/is-disney-pursuing-genius-brands-we-are-hearing-rumors>

It is our assessment that Josh Flo—a low-level real estate agent—is not in a position to “hear rumors” of this level. He was fed this information and hired to publish it as a fall guy.

TheFly also covered this: <https://thefly.com/landingPageNews.php?id=3109307&headline=GNUS;DIS-Disneyfocused-blog-circulates-Genius-Brands-rumor>



When Josh Flo wrote this piece—<https://disneyguide.com/f/is-disney-pursuing-genius-brands-we-are-hearing-rumors>—GNUS stock suddenly halted its downward trajectory and moved from \$3.45 to \$4.52. It traded hundreds of millions of shares and has never been that high since. Then, on June 15th, after Josh managed to seed the forums and chat rooms, he pulled the piece off the website and since then it has been showing a “404 page” error.

The stock was in freefall, falling from \$7.93 on the 3rd of June to \$3.97 on the 9th June. Then on the 10th June Josh publishes his report and the downtrend immediately stops and reverses and closes the day at \$4.51, trading 113,550,664 shares.

The next day, the stock falls a little but still trades 151,898,954 shares.

Then, on the 12th, it recovers to \$4.16 with 95,905,448 shares traded.

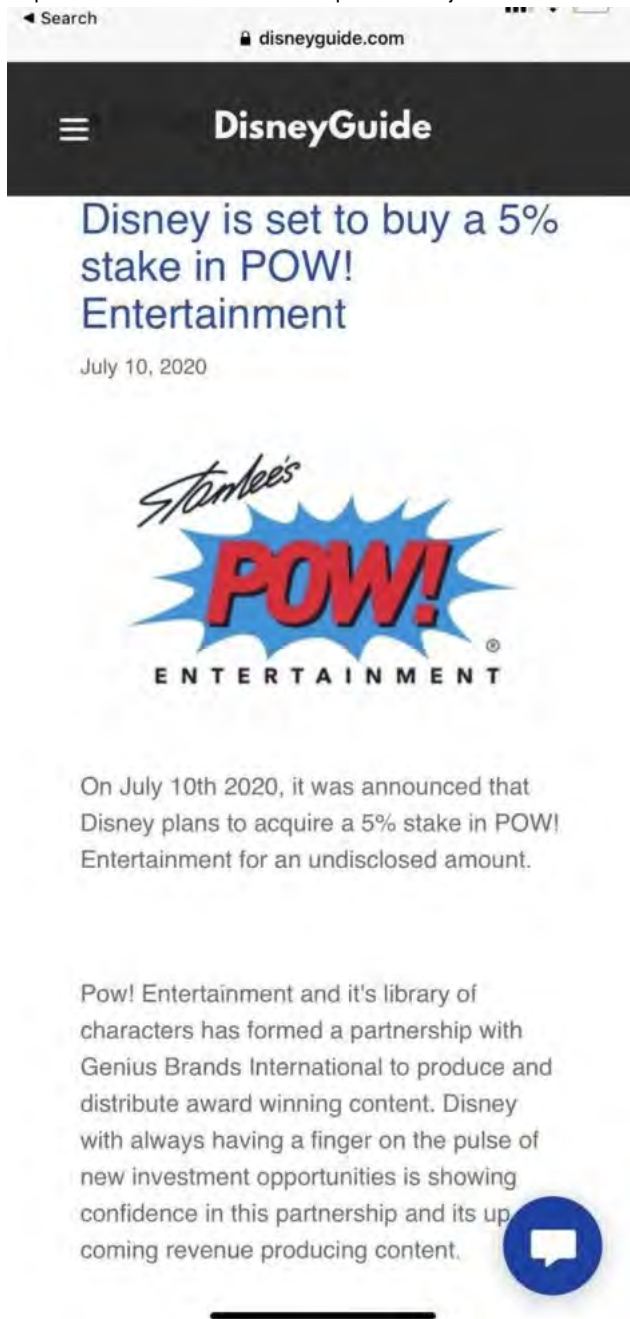
The next day of trading is the 15th where Josh hits social media and pushes the report hard to people. The stock rallies to \$4.52 and trades 118,788,498 shares. Josh then knows he has done his work and the rumors are out so he does the wise thing and pulls the report down (likely on instructions from Moez Kassam/Anson).

Please take into account the above numbers are very impressive as the average volume for GNUS is 30,000,000 shares a day.

Obviously, the media picks up on this and the stock starts falling. But what is important to note here is that this rumor stopped the downward movement, as it was not to Moez Kassam’s liking.

But Josh didn’t stop there. Seeing the success of his handiwork a plan was put in place by Anson to do something else. This time it was 100% fraudulent.

On July 6th, Josh Flo published the below piece on DisneyGuide.com (again, the content was removed from Disneyguide.com)



This was again covered by TheFly: <https://thefly.com/landingPageNews.php?id=3123795&headline=GNUS;DIS-Genius-Brands-rallies-after-report-of-Disney-stake-in-POW-Entertainment>

Then, later in the day on July 7th, TheFly spotted that something was very wrong in this post:

<https://thefly.com/landingPageNews.php?id=3123811&headline=GNUS;DIS-Genius-Brands-gives-up-gains-after-Disneyfocused-blog-pulls-POW-report>

BREAKING NEWS Instant updates and real-time market news.

GNUS, DIS
13:56 07/10/20

Genius Brands gives up gains after Disney-focused blog pulls POW! report

Shares of Genius Brands (GNUS), which had spiked earlier this afternoon following a blog post claiming that Disney (DIS) planned to acquire a 5% stake in POW! Entertainment for an undisclosed amount, are back to flat for the session at \$2.40 per share after the website, DisneyGuide, pulled the web page with the report from its site. Genius announced on July 6 that the company and Stan Lee's POW! Entertainment inked a deal to create Stan Lee Universe, a joint venture that will assume worldwide rights across media to Lee's post-Marvel intellectual property. [Reference Link](#)

GNUS DIS

GNUS **DIS**

GNUS
Genius Brands **\$2.38 / -0.01 (-0.42%)**

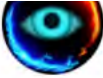
04 Aug

Let's put this into perspective: On the 6th, the stock traded 170,176,462 shares, and on the 7th the stock traded 135,704,257 – **remember the average volume for GNUS is 30,000,000 shares a day**. This is a huge increase and hundreds of millions of dollars have been siphoned off from investors with this fraud.

The piece did not stay up long because it did not need to, and the share price did not go up much – but that was never the intention. The goal here was volume. It is this volume that allowed Moez Kassam and Anson Funds to do exactly what they needed to and disguise their actions from everyone around them.

This led to a revolt from shareholders and investors online, as well as a flurry of negative commentary from traders and followers:

https://stocktwits.com/_Dreamer_/message/226803527



\$GNUS @Floman Mr. Josh Flo, owner of disneyguide.com/. Can you answer to the people why there was a fake article on the site you own, and why it has since been removed? I hope the SEC comes to pay you a visit. This was not the first time a posting on your site let people to invest. PS... how is the real estate business going? (yelp.com/biz/josh-flo-r...)



YatesInvesting

7/10/20, 02:05 PM

@_Dreamer_ @Floman I actually hope for the same. That's BS



2

[Home](#)**boylec1986**

Bearish

7/10/20, 01:24 PM

\$GNUS

Plus

They took the article down at disneyguide.com/.

Careful. Smells terrible.

Facebook group

“Disney Guide” exists connected to site.

“Josh Flo” and “Cassie Flo” own it.

Sounds like they just stole a bunch of people’s money.

5 1 ...

1

5 Likes

**DaBabyInvestments**

Bullish

7/10/20, 01:24 PM

[@boylec1986](#) LOL.

1

It was also covered on Benzinga: <https://www.benzinga.com/news/20/07/16589312/genius-brands-pops-and-drops-on-sketchy-rumor>

GENIUS BRANDS INTL. GNUS, wait Disney
Company The NYSE:DIS - Genius Brands Pops
And Drops On Sketchy Rumor

Pops And Drops On Sketchy

Rumor



Jayson Derrick , Benzinga Staff Writer

[FOLLOW+](#)

July 10, 2020 2:10pm

1 min read

[Comments](#)

→ [Click here to get Benzinga's premium stock trading newsletter.](#)



More coverage:

https://www.reddit.com/r/gnus_stock/comments/hosv84/disney_set_to_buy_5_percent_stake_in_pow/

<https://www.benzinga.com/news/20/07/16589627/genius-brands-ceo-andy-heyward-discusses-recent-circulation-of-report-suggesting-disney-could-buy-5>

<https://stocktwits.com/Vegas1/message/226783189>

[Home](#)**Vegas1** Bullish

7/10/20, 01:11 PM

[Plus](#)

\$GNUS : GNUS Moving on circulations of this...
Disney is set to buy a 5% stake in POW!
Entertainment ... Pow! Entertainment and it's
library of characters has formed a partnership
with Genius Brands International to produce and
distribute award winning content.

ADDED 3\$ calls x AUG 21 at 0.40

👍 7 🔄 1 ...

🔍 18

7 Likes     

**Penny_Master** Bullish

7/10/20, 01:12 PM

[@Vegas1](#) Disney already has a stake in POW

[Replies](#)

👍 2 🔄 ...

18

**JiuJitsuSolvesEverything**

7/10/20, 01:12 PM

[@tgriff732_](#) [@Vegas1](#) they have since 2009

👍 2 🔄 ...

18

**Vegas1** Bullish

7/10/20, 01:17 PM

[Plus](#)

[@JiuJitsuSolvesEverything](#) [@tgriff732_](#) yes but Stan Lee University
changes it all


👍 3 🔄 ...


18


**Penny_Master** Bullish


7/10/20, 01:19 PM


[@Vegas1](#) [@JiuJitsuSolvesEveryt](#) agreed


 **MoneyMitch27** 7/10/20, 01:22 PM
@Vegas1 haven't been able to verify this people say Disney guide site isn't real
1 18

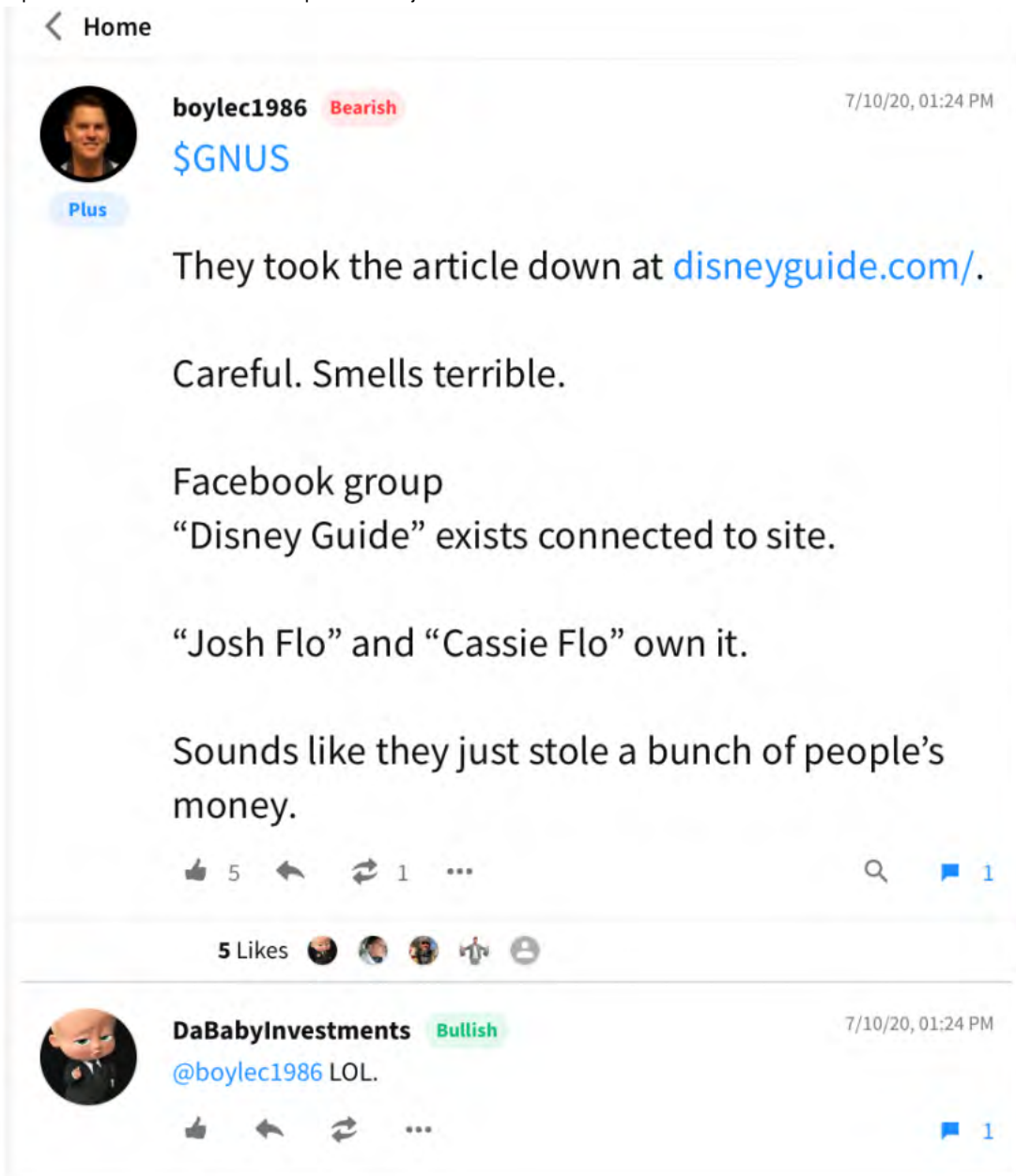
 **TimeDirectionVolatility** 7/10/20, 01:39 PM
@Vegas1 @tgriff732_ Actually, they don't...deal never happened
18

 **Vegas1** Bullish 7/10/20, 01:44 PM
@TimeDirectionVolatility @tgriff732_ I dont care about the past I care about the now - maybe this time it will happen
2 18

 **Penny_Master** Bullish 7/10/20, 01:51 PM
@TimeDirectionVolatility @Vegas1 and how do u know that smarty pants I see it did happen
18

 **TimeDirectionVolatility** 7/10/20, 01:53 PM
@Vegas1 @tgriff732_ Agree. Just correcting those that said deal was done 11 yrs ago
1 18

 **TimeDirectionVolatility** 7/10/20, 01:54 PM
@tgriff732_ Well, CEO just said it. Believe what you wish. See Bezinga
2 18



So, now what happens?

For Moez Kassam and Anson Funds, the weak link is ... indeed weak.

We have reached out to Josh Flo and he has confirmed that he is the owner of DisneyGuide.com. He also confirmed that he published the reports.

When confronted about market manipulation and fraud, Josh Flo responded: *"Look I didn't do any market manipulation on purpose, I'm not nearly smart enough for that. I was just playing around with my new blog site."*

Below is a copy of the mail where Josh admits to making the posts:

On Friday, October 30, 2020 10:31 PM, Josh - Flo Real Estate Team <[REDACTED]> wrote:

Look I didn't do any market manipulation on purpose, I'm not nearly smart enough for that. I was just playing around with my new blog site.

- Josh Flo

Now licensed in Minnesota and Wisconsin!
Ask about our 4.9% listing fee!

Flo Real Estate Team
www.FloRealEstate.com

[REDACTED]
Sent from my Mobile Phone

On Fri, Oct 30, 2020, 4:32 PM [REDACTED] wrote:
Josh,

I'm not entirely sure what the escrow.com connection is. This is simply a clearing house for domains and other goods.

I am rather concerned, however, that you are misunderstanding the situation related to this domain. You are not protected by freedom of speech when it comes to deliberate market manipulation.

Flo did make a half-hearted attempt to hide the ownership details of the domain – but this is very easy to uncover and here is Josh Flo applying for a trademark on the name: <https://uspto.report/TM/88960638>

DISNEYGUIDE.COM

Flo, Joshua J

USPTO Trademarks • Flo, Joshua J • Disneyguide.com Application #88960638

Application Filed: 2020-06-11

Trademark Application Details


DisneyGuide.com

Mark For: DISNEYGUIDE.COM™ trademark registration is intended to cover the category of providing a website featuring entertainment information.

Status

2020-06-15 UTC

[Refresh](#)

 LIVE APPLICATION Awaiting Examination

The trademark application has been accepted by the Office (has met the minimum filing requirements) and has not yet been assigned to an examiner.

We also have the e-mail conversation in which he admits to owning the domain and publishing the fake information. We believe that one of two things can happen now with regard to Josh Flo: 1) Either Moez Kassam will offer him additional hush money; or 2) Flo will come to understand that it is in his best interest to cooperate with the authorities.

We've also archived the Twitter and StockTwits posts in case there is an attempt to remove them as this investigations gains momentum:

[Stocktwits archive 1](#)

[Stocktwits archive 2](#)

[Twitter archive 1](#)

[Twitter archive 2](#)

[Disneyguide.com archive](#)

SEC – I hope you will be having a conversation with Josh Flo on this illegal activity, fraud and deliberate manipulation of a NASDAQ listed stock. This is serious and needs to be investigated.

There is more but sadly this is only for the eyes of the regulators as we cannot afford to put our sources at risk. When we have more that can be shared with the public we will post.

In the meantime, others have joined the crusade and you can see other updates from them on Anson's corruption here:

<https://www.reddit.com/r/BurnedByAnsonFunds/>

NEWS

ANSON FUNDS MOEZ KASSAM RECONNAISSANCE AFRICA

« Previous Post

[Corruption at Globe and mail – Mail sent to their staff and regulators](#)

LEAVE A REPLY

Your email address will not be published. Required fields are marked *

Comment

Name *

Email *

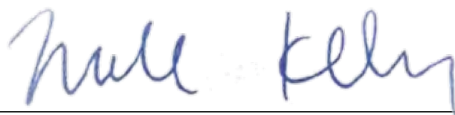
☐ Save my name, email, and website in this browser for the next time I comment.

Post Comment

WordPress Theme: Treville by ThemeZee.

TAB 2L

This is **Exhibit “L”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read 'Huu Kelly', is written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

B E T W E E N:

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP and MOEZ KASSAM

Plaintiffs

and

JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR,
JACOB DOXTATOR, AND JOHN DOE 1, JOHN DOE 2, JOHN DOE 3,
JOHN DOE 4 AND OTHER PERSONS UNKNOWN

Defendants

A N D B E T W E E N:

ROBERT LEE DOXTATOR

Plaintiff by Counterclaim

and

ALLEN SPEKTOR, ANDREW RUDENSKY, ANSON ADVISORS INC.,
ANSON FUNDS MANAGEMENT LP, ANSON INVESTMENTS MASTER
FUND LP and MOEZ KASSAM

Defendants to the Counterclaim

**AFFIDAVIT OF DOCUMENTS
Sworn January 25, 2022**

I, Moez Kassam, of the City of Toronto, in the Province of Ontario, MAKE OATH
AND SAY:

1. I am the founder of the Plaintiffs, Anson Advisors Inc., Anson Funds Management LP, and Anson Investments Master Fund LP. Additionally, I serve as a director and the principal, Chief Executive Officer and Chief Investment Officer of Anson Advisors Inc. I am also a Plaintiff in this litigation in my personal capacity.

2. I have conducted a diligent search of my records and made appropriate enquiries of others to inform myself in order to make this Affidavit. This Affidavit discloses, to the full extent of my knowledge, information and belief, all documents relevant to any matter in issue in this action that are or have been in my possession, control or power.

3. I have listed in Schedule "A" those documents that are in my possession, control or power and that I do not object to producing for inspection.
4. I have listed in Schedule "B" those documents that are or were in my possession, control or power and that I object to producing because they are privileged, and I have stated in Schedule "B" the grounds for each such claim of privilege.
5. I have never had in my possession, control or power any document relevant to any matter in issue in this action other than those listed in Schedules "A" and "B".

SWORN BEFORE ME at the City of
Toronto, in the Province of Ontario this
25th day of January, 2023.



Commissioner for Taking Affidavits
(or as may be)
Maura O'Sullivan
(LSO #77098R)



Moez Kassam

LAWYER'S CERTIFICATE

I CERTIFY that I have explained to the deponent,

- (a) the necessity of making full disclosure of all documents relevant to any matter in issue in the action;
- (b) what kinds of documents are likely to be relevant to the allegations made in the Pleadings; and
- (c) if the action is brought under the simplified procedure, the necessity of providing the list required under rule 76.03.

Date: January 25, 2023



Maura O'Sullivan

SCHEDULE “A”

Documents in my possession, control or power that I do not object to producing for inspection.

See attached spreadsheet.

SCHEDULE "B"

Documents that are or were in my possession, control or power that I object to producing on the grounds that they are protected by:

- (d) **Lawyer-Client Privilege:** Documents containing confidential professional communications passing between the deponent, or the deponent's agent and the deponent's legal advisers directly related to the seeking or receiving of legal advice or legal assistance.
- (e) **Litigation Privilege:** Documents comprised of notes, memoranda, reports, confidential correspondence, and copies thereof, prepared for the purposes of obtaining or providing advice concerning this litigation, of obtaining or providing information and evidence to be used in this litigation and preparing for and prosecuting this litigation.
- (f) **Without Prejudice Communication Privilege:** Documents containing or reflecting communications of a without prejudice nature concerning the matters in issue in this litigation.

See attached spreadsheet.

SCHEDULE A

Doc ID	Parent/Attachment	Parent_Date	Doc_Date	File_Type	Author	Recipient	BCC	CC	Title	Redacted	Reason for redaction
AAI00000002	P	9/25/2020	9/25/2020	Web Post					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000005	P	10/3/2020	10/3/2020	Web Post	www.MarketInvestigations.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000007	P	1/1/1900	1/1/1900	Email	Robert	Jeff7621			Correspondence signed Robert		
AAI00000008	P	10/5/2020	10/5/2020	Quotes from Unidentified Audio Source	DALGRANDEG1				Interesting Timeslots		
AAI00000012	P	10/4/2020	10/4/2020	Web Post	www.MarketInvestigations.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000013	P	11/9/2020	11/9/2020	Email Message	"Michelle Zatlyn" <michelle@cloudflare.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Moez Kassam" <mkassam@ansonfunds.com>	Re: urgent help		
AAI00000014	P	11/26/2020	11/26/2020	Email		Jeff7621			Correspondence with Hotline		
AAI00000017	P	10/3/2020	10/3/2020	Web Post	www.marketinvestigations.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000018	P	12/14/2020	12/14/2020	Email Message	"Laura Salvatori" </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d7ab6589bd44c52adc76a76be851426-Laura Salva>"	"abuses@abelohost.net" <abuses@abelohost.net>;'admin@abeloho st.nl" <admin@abelohost.nl>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost		
AAI00000019	P	10/4/2020	10/4/2020	Web Page	ansonfundsfraud.com				ansonfundsfraud.com whois lookup - who.is		
AAI00000022	P	9/28/2020	9/28/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			FW: Mark: Have you seen this developing scandal in Canada and the U.S.? Fraud, corruption and Moez Kassam of Anson Funds	Yes	1. Privileged Information
AAI00000023	P	10/29/2020	10/29/2020	Web Post	whois.domaintools.com				MarketCrimes.to WHOIS, DNS, & Domain Info - DomainTools		
AAI00000024	P	10/3/2020	10/3/2020	Web Post	marketinvestigations.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000027	P	10/4/2020	10/4/2020	Web Post	marketinvestigations.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000028	P	9/27/2020	9/27/2020	Web Post	www.moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000030	P	7/23/2020	7/23/2020	Web Post	JustinTime				The Real Story on Moez Kassam and Anson Funds — Part 1		
AAI00000031	P	10/3/2020	10/3/2020	Web Post	marketinvestigations.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000033	P	10/5/2020	10/5/2020	Email	Luigi Calabrese	Moez Kassam			mk.com	Yes	1. Privileged Information
AAI00000034	P	8/14/2020	8/14/2020	Web Post	deepakSh				Moez Kassam Anson Funds The guy who lost his shirt on Tilray		
AAI00000037	P	10/5/2020	10/5/2020	Email	Stock Manipulators	Hamida Sachedina			Huge Hedge Fund Scandal n Huge Hedge Fund Scandal in Canada and the US: Moez Kassam and Anson Funds Accused of Stealing Billions		
AAI00000038	P	10/3/2020	10/3/2020	Web Post	marketinvestigations.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000039	P	8/14/2020	8/14/2020	Web Post	deepakSh				Just read this on Yahoo: short seller Moez Kassam got BURNED; Moez Kassam and Anson Funds — the Loser who lost his shirt on Tilray		
AAI00000042	P	11/26/2020	11/26/2020	Email	Laura Salvatori				Unsolicited Email		
AAI00000043	P	8/30/2020	8/30/2020	Comments of Web Page					APHA 4.6900 0.1200 2.63% _ Aphria Inc. - Yahoo Finance		
AAI00000046	P	9/28/2020	9/28/2020	Web Page	Stockhouse				Aphria Inc. _ T.APHA Stock Message Board & Forum _ Stockhouse 9.27.20		
AAI00000049	P	9/27/2020	9/27/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds _ A Tale of Corruption, Greed, and Failure		
AAI00000051	P	8/18/2020	8/18/2020	Web Page	Stockhouse				Aphria Inc. _ T.APHA Stock Message Board & Forum _ Stockhouse		
AAI00000055	P	9/27/2020	9/27/2020	Web Post	www.moezkassam.com				Moez Kassam and Anson Funds _ A Tale of Corruption, Greed, and Failure; Part 1 of 3		
AAI00000056	P	8/30/2020	8/30/2020	Web Page	Stockhouse				Aurora Cannabis Inc. _ T.ACB Stock Message Board & Forum _ Stockhouse		
AAI00000061	P	9/28/2020	9/28/2020	Web Page	Stockhouse				Facedrive Inc. _ V.FD Stock Message Board & Forum _ Stockhouse 9.27.20 2		
AAI00000065	P	9/29/2020	9/29/2020	Web Post	moeskassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000066	P	9/28/2020	9/28/2020	Web Page	Stockhouse				Facedrive Inc. _ V.FD Stock Message Board & Forum _ Stockhouse 9.27.20		

SCHEDULE A

AAI00000069	P	11/3/2020	11/3/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				*TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost		
AAI00000070	A	11/3/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000071	A	11/3/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000072	A	11/3/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000073	A	11/3/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000074	A	11/3/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000075	P	9/29/2020	9/29/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000076	P	8/30/2020	8/30/2020	Web Page	Stockhouse					Facedrive Inc. _ V.FD Stock Message Board & Forum _ Stockhouse		
AAI00000080	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROU (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"info@benzinga.com" <info@benzinga.com>;"legal@benzinga.com" <legal@benzinga.com>;"info@benzinga.com" <info@benzinga.com>;"editorial@benzinga.com" <editorial@benzinga.com>;"support@benzinga.com" <support@benzinga.com>;"legal@benzinga.com" <legal@benzinga.com>"				*TIME SENSITIVE* Defamatory Article Hyperlinked on Benzinga		
AAI00000081	P	10/17/2020	10/17/2020	Text Message	James Stafford	Robert Doxtator				Harvest Moon X OilPrice		
AAI00000082	P	9/29/2020	9/29/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000084	P	8/30/2020	8/30/2020	Web Page	Stockhouse					GFL Environmental Inc. Subordinate no par value - reposting ZENA - _ V.GFL.P Stock Message Board & Forum _ Stockhouse		
AAI00000085	P	10/1/2020	10/1/2020	Text File						Moez - Betting Bruiser Chat 10.1.20.txt		
AAI00000086	P	10/1/2020	10/1/2020	Web Post	stockmanipulators.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000088	P	8/26/2020	8/26/2020	Web Page	Stockhouse					GFL Environmental Inc. Subordinate no par value _ T.GFL Stock Message Board & Forum _ Stockhouse		
AAI00000091	P	10/1/2020	10/1/2020	Web Post	Stockmanipulators.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000094	P	9/28/2020	9/28/2020	Web Page Screenshots	Stockhouse					Negative Stockhouse Screenshots - 09.28.20		
AAI00000096	P	9/28/2020	9/28/2020	Web Page and Twitter Screenshots	Philmon Rezene					Negative Twitter and investor hub Screenshots - 09.28.20		
AAI00000097	P	10/1/2020	10/1/2020	Web Post	www.stockmanipulators.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000107	P	10/1/2020	10/1/2020	Web Post	www.stockmanipulators.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000108	P	10/1/2020	10/1/2020	List	James Stafford					Journalists		
AAI00000110	P	10/29/2020	10/29/2020	Tweet	John Murphy					Screenshot 2020-10-29 at 18.18.13 - Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000111	P	10/1/2020	10/1/2020	Web Post	Stockmanipulators.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000114	P	8/26/2020	8/26/2020	Web Page	Stockhouse					Tilray Stock Message Board & Forum _ Stockhouse		
AAI00000118	P	10/1/2020	10/1/2020	Web Post	Stockmanipulator.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000134	P	8/26/2020	8/26/2020	Report	Laura Salvatori					Why did Moez and Anson Funds help put the GFL Short Report		
AAI00000137	P	8/30/2020	8/30/2020	Web Page	Stockhouse					Zenabis Global Inc. - Ordinary Shares _ T.ZENA Stock Message Board & Forum		
AAI00000143	P	10/29/2020	10/29/2020	Web Post	capitalmarketcrimes.to					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		

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AAI00000147	P	10/19/2020	10/19/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000156	P	10/20/2020	10/20/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000159	P	10/29/2020	10/29/2020	Web Post	capitalmarketcrimes.to					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000161	P	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"jeff.fox@endurance.com" <jeff.fox@endurance.com>;"david@endurance.com" <david@endurance.com>"		"legal@endurance.com" <legal@endurance.com>"		RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000162	P	10/29/2020	10/29/2020	Web Post	capitalmarketcrimes.to					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00000163	P	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"icann@icann.org" <icann@icann.org>"				*TIME SENSITIVE* Domain Name De-Registration Request - Breach of 15 § U.S.C. 8131		
AAI00000164	A	9/28/2020	9/27/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds_ A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00000165	P	10/29/2020	10/29/2020	Web Post	capitalmarketcrimes.to					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00000167	P	10/3/2020	10/3/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"legal@instra.com" <legal@instra.com>;"abuse@instra.com" <abuse@instra.com>"				RE: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00000168	P	10/29/2020	10/29/2020	Web Post	capitalmarketcrimes.to					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00000169	P	10/4/2020	10/4/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"legal@instra.com" <legal@instra.com>;"abuse@instra.com" <abuse@instra.com>"				RE: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00000170	A	10/4/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000171	A	10/4/2020	9/28/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000172	P	10/29/2020	10/29/2020	Web Post	capitalmarketcrimes.to					Moez Kassam and Anson Funds _ A Tale of Corruption, Greed, and Failure – Capital Market Crimes 2		
AAI00000173	P	10/26/2020	10/26/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				Details of Defamatory Postings		
AAI00000174	A	10/26/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000175	A	10/26/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000176	A	10/26/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000177	A	10/26/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000178	A	10/26/2020	10/26/2020	Web Post	evtrader					Post Number 31409659 - Moez Kassam and Anson Funds - Short \$500 M And Lose It All		

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AAI00000179	A	10/26/2020	10/26/2020	Web Post	JusInTime				Post Number 31307009 - The Real Story on Moez Kassam and Anson Funds — Part 1		
AAI00000180	A	10/26/2020	8/26/2020	Web Page	Stockhouse				Post Number 31451382		
AAI00000181	A	10/26/2020	8/30/2020	Web Page	Stockhouse				Post Number 31470222		
AAI00000182	A	10/26/2020	10/26/2020	Web Post	Bundyj				Post Number 31419651 - The Real story on what happened with Moez Kassam and Aphria		
AAI00000183	A	10/26/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000184	P	10/29/2020	10/29/2020	Web Post	capitalmarketcrimes.to				Moez Kassam and Anson Funds_ A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00000185	P	10/30/2020	10/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Tonic Hostmaster" <hostmaster@tonic.to>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00000186	P	10/29/2020	10/29/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"hostmaster@tonic.to" <hostmaster@tonic.to>"			*TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00000187	A	10/29/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000188	A	10/29/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000189	A	10/29/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000190	A	10/29/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000191	A	10/29/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000192	P	10/29/2020	10/29/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"hostmaster@tonic.to" <hostmaster@tonic.to>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00000193	P	11/4/2020	11/4/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost		
AAI00000194	P	11/5/2020	11/5/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost		
AAI00000195	P	12/16/2020	12/16/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost		
AAI00000196	P	10/28/2020	10/28/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: Details of Defamatory Postings		
AAI00000197	A	10/28/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000198	A	10/28/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		

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AAI00000199	A	10/28/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000200	A	10/28/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000201	A	10/28/2020	10/26/2020	Web Post	evtrader				Post Number 31409659 - Moez Kassam and Anson Funds - Short \$500 M And Lose It All		
AAI00000202	A	10/28/2020	10/26/2020	Web Post	JusInTime				Post Number 31307009 - The Real Story on Moez Kassam and Anson Funds — Part 1		
AAI00000203	A	10/28/2020	8/26/2020	Web Page	Stockhouse				Post Number 31451382		
AAI00000204	A	10/28/2020	8/30/2020	Web Post	Stockhouse				Post Number 31470222		
AAI00000205	A	10/28/2020	10/26/2020	Web Post	Bundjy				Post Number 31419651 - The Real story on what happened with Moez Kassam and Aphria		
AAI00000206	A	10/28/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000207	P	9/28/2020	9/28/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000208	P	10/6/2020	10/6/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"PublicDomainRegistry.com" <abuse@publicdomainregistry.com>"			RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00000209	P	10/5/2020	10/5/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>"			RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00000211	P	10/8/2020	10/8/2020	Email Message	"elliot noss (Compliance)" <compliance@opensrs.org>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			[Tucows Inc - Compliance] Re: *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00000212	P	9/30/2020	9/30/2020	Email Message	"Spencer Israel" <spencerisrael@benzinga.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"		"Editorial" <editorial@benzinga.com>;"Partner Content" <partnercontent@benzinga.com>"	Benzinga article		
AAI00000213	P	10/6/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000214	P	10/1/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000215	P	10/5/2020	10/5/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000217	P	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000219	P	10/4/2020	10/4/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000220	P	10/4/2020	10/4/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000221	P	10/8/2020	10/8/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000222	P	9/29/2020	9/29/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000223	P	9/29/2020	9/29/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000225	P	9/29/2020	9/29/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000227	P	9/30/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000228	P	9/28/2020	9/28/2020	Email Message	"Global Support Center" <noreply@icann.org>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			A New Case Has Been Created - Case 00977514		

AAI00000229	P	10/5/2020	10/5/2020	Email Message	"Louise Lentino" <louisel@instra.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"abuse@instra.com" <abuse@instra.com>;"(IN Distribution Group: Legal" <legal@instra.com>"			Re: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00000230	P	9/30/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: Unlawful activity - https://moezkassam.com/		
AAI00000231	P	9/29/2020	9/29/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: Unlawful activity - https://moezkassam.com/		
AAI00000233	P	10/6/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00000235	P	9/30/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00000236	P	10/5/2020	10/5/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00000237	P	10/6/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00000238	P	10/30/2020	10/30/2020	Email Message	"Tonic Hostmaster" <hostmaster@tonic.to>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00000239	P	10/31/2020	10/31/2020	Email Message	"Tonic Hostmaster" <hostmaster@tonic.to>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00000240	P	10/8/2020	10/8/2020	Email Message	"elliott noss" <enoss@tu cows.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"		"Compliance" <compliance@opensrs.org>"	Re: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00000241	P	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000242	P	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000243	A	10/1/2020	10/1/2020	Web Post	www.stockmanipulators.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000244	A	10/1/2020	10/1/2020	Web Post	www.stockmanipulators.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000245	A	10/1/2020	10/1/2020	Web Post	www.stockmanipulators.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000246	P	10/4/2020	10/4/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000247	P	10/5/2020	10/5/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000248	P	10/8/2020	10/8/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000249	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000250	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		

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AAI00000251	P		9/30/2020	9/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000252	P		9/29/2020	9/29/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000253	A		9/29/2020	9/29/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000254	A		9/29/2020	9/29/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000255	A		9/29/2020	9/29/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000256	P		9/29/2020	9/29/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>"				RE: Unlawful activity - https://moezkassam.com/		
AAI00000257	A		9/29/2020	9/29/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000258	A		9/29/2020	9/29/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000259	A		9/29/2020	9/29/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000260	P		10/1/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>;"abuse@ publicdomainregistry.com" <abuse@publicdomainregistry.com>"				RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00000261	P		9/30/2020	9/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>;"abuse@ publicdomainregistry.com" <abuse@publicdomainregistry.com>"	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"			RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00000262	P		10/8/2020	10/8/2020	Email Message	"Laura Salvatori" </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2 d7ab6589bd44c52adc76a76be851426- Laura Salva>"	"compliance@opensrs.org" <compliance@opensrs.org>;"info@tu cows. com" <info@tu cows.com>;"disputes@opensrs.or g" <disputes@opensrs.org>;"enoss@tu cows. com" <enoss@tu cows.com>"				Re: *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00000263	P		10/8/2020	10/8/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"Compliance" <compliance@opensrs.org>;"enoss@tucow s.com" <enoss@tu cows.com>"				RE: [Tucows Inc - Compliance] Re: *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00000264	A		10/8/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000265	P		10/8/2020	10/8/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"compliance@opensrs.org" <compliance@opensrs.org>;"info@tu cows. com" <info@tu cows.com>;"disputes@opensrs.or g" <disputes@opensrs.org>"				*TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00000266	P		10/8/2020	10/8/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"elliott noss" <enoss@tu cows.com>"			"Compliance" <compliance@opensrs.org>"	RE: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00000267	A		10/8/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000268	A		10/8/2020	10/1/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/ CN=2D7AB6589BD44C52ADC76A76BE85 1426-LAURA SALVA>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000269	A		10/8/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <l salvatori@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		

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AAI00000270	A	10/8/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000275	P	12/8/2020	12/8/2020	Web Post	stoknsyrup				Post Number 31470222 - Moez Kassam and Anson at it again - you guys got off lightly		
AAI00000276	P	11/11/2020	11/11/2020	Web Post	moezkassam.com				Stockhouse - ZENA - Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000277	P	12/16/2020	12/16/2020	Web Post	evtrader				Post# 31409659 - Moez Kassam and Anson Funds - Short \$500 M And Lose It All		
AAI00000278	P	3/8/2021	3/8/2021	Web Post	Benjaminefraim				FD Stockhouse Post# 32739536 - Canadian Hedge Fund Under SEC Investigation		
AAI00000279	P	10/26/2020	10/26/2020	Web Post	evtrader				Post Number 31409659 - Moez Kassam and Anson Funds - Short \$500 M And Lose It All		
AAI00000280	P	8/14/2020	8/14/2020	Web Post	evtrader				Post Number 31409659 - Moez Kassam and Anson Funds - Short \$500 M And Lose It All		
AAI00000287	P	8/17/2020	8/17/2020	Web Post	Bundyj				Post Number 31419651 - The Real story on what happened with Moez Kassam and Aphria		
AAI00000288	P	10/26/2020	10/26/2020	Web Post	JusInTime				Post Number 31307009 - The Real Story on Moez Kassam and Anson Funds — Part 1		
AAI00000289	P	3/8/2021	3/8/2021	Web Post with Comments	Mark Baliwalla				Anson Funds under SEC Investigation - Do Unitholders know?		
AAI00000290	P	3/8/2021	3/8/2021	Web Post	GordonGatsby				APHA Stockouse Post# 32738680 - Anson Funds under SEC Investigation - Do Unitholders know?		
AAI00000292	P	10/26/2020	10/26/2020	Web Post	Bundyj				Post Number 31419651 - The Real story on what happened with Moez Kassam and Aphria		
AAI00000293	P	3/8/2021	3/8/2021	Web Post	GordonGatsby				Aphria Inc. T.APHA Stock Message Board & Forum Stockhouse - Anson Funds under SEC Investigation - Do Unitholders know?		
AAI00000294	P	3/7/2021	3/7/2021	Web Post	GordonGatsby				Aphria Inc. T.APHA Stock Message Board & Forum Stockhouse - Anson Funds under SEC Investigation - Do Unitholders know?		
AAI00000295	P	3/8/2021	3/8/2021	Web Post	GordonGatsby				Aphria Inc. T.APHA Stock Message Board & Forum Stockhouse - Anson Funds under SEC Investigation - Do Unitholders know?		
AAI00000296	P	12/15/2021	12/15/2021	Web Post	marketfrauds.to				DoJ Targets Anson Funds for Illegal Short-Selling, Fraud and Insider Trading – Market frauds		
AAI00000381	P	6/29/2021	6/29/2021	Spreadsheet					User Profile Data 2021 06 29 from Stockhouse		
AAI00000387	P	6/11/2021	6/11/2021	Court Order	T. McEwen, J.				Order Granting Motion		
AAI00000388	P	3/25/2021	3/25/2021	Letter	Iris Fischer (Blakes)	Gary Kelly (Stockhouse Publishing Ltd.)			Abusive Content about Anson Funds on Stockhouse		
AAI00000390	P	3/25/2021	3/25/2021	Letter	Iris Fischer (Blakes)	Gary Kelly (Stockhouse Publishing Ltd.)			Abusive Content about Anson Funds on Stockhouse		
AAI00000442	P	7/22/2022	7/22/2022	Twitter Feed	Betting Bruiser				Betting Bruiser Tweets and Replies		
AAI00000443	P	11/1/2022	11/1/2022	Tweets	Betting Bruiser				Betting Bruiser Tweets & Replies		
AAI00000444	P	6/29/2019	6/29/2019	Tweets	Betting Bruiser				Betting Bruiser Tweets		
AAI00000445	P	3/4/2021	3/4/2021	Tweets	Betting Bruiser				Betting Bruiser Tweets		
AAI00000446	P	3/30/2019	3/30/2019	Tweets	Betting Bruiser				Betting Bruiser Tweets		
AAI00000447	P	12/29/2019	12/29/2019	Tweets	Betting Bruiser				Betting Bruiser Tweets		
AAI00000448	P	12/31/2018	12/31/2018	Tweets	Betting Bruiser				Betting Bruiser Tweets		
AAI00000449	P	6/29/2022	6/29/2022	Tweets	Betting Bruiser				Betting Bruiser Tweets		
AAI00000450	P	7/15/2022	7/15/2022	Twitter Thread	Betting Bruiser				Betting Bruiser Tweets and Replies		
AAI00000451	P	7/22/2022	7/22/2022	Tweets	Betting Bruiser				Betting Bruiser Latest Tweets		
AAI00000452	P	11/2/2022	11/2/2022	Tweets	Betting Bruiser				Betting Bruiser Tweets		
AAI00000454	P	11/2/2022	11/2/2022	Twitter Thread	Betting Bruiser				Betting Bruiser Tweets and Replies		
AAI00000455	P	5/26/2020	5/26/2020	Tweets	Jacob Doxtator				Jacob Doxtator Tweets & replies		
AAI00000464	P	10/9/2020	10/9/2020	Chat Transcript	Betting Bruiser, Moez Kassam				Moez - Betting Bruiser Chat Extract		
AAI00000465	P	11/14/2022	11/14/2022	Tweet	Betting Bruiser				Betting Bruiser Tweet		
AAI00000466	P	4/5/2021	4/5/2021	Twitter Feed	Betting Bruiser				Betting Bruiser Twitter Feed		
AAI00000467	P	3/29/2021	3/29/2021	Video	Fortress Technologies Inc.				Fortress Technologies Inc.		
AAI00000468	P	8/1/2019	8/1/2019	Report	SEI				Profit and Loss Report		
AAI00000469	P	8/1/2019	8/1/2019	Report	SEI				Profit and Loss Report		
AAI00000470	P	8/15/2019	8/15/2019	Report	SEI				Trade Details		
AAI00000471	P	8/15/2019	8/15/2019	Report	SEI				Trade Details		
AAI00000474	P	9/28/2020	9/28/2020	Web Post	Randolph				Web post on Yahoo Finance		
AAI00000475	P	10/5/2020	10/5/2020	Invoice	Artemis Risk Consulting	Moez Kassam			Invoice ANS001	Yes	1. Privileged Information
AAI00000476	P	10/28/2020	10/28/2020	Invoice	Artemis Risk Consulting	Moez Kassam			Invoice ANS001	Yes	1. Privileged Information
AAI00000477	P	11/26/2020	11/26/2020	Invoice	Artemis Risk Consulting	Moez Kassam			Invoice ANS003	Yes	1. Privileged Information
AAI00000478	P	4/19/2021	4/19/2021	Tweets	Betting Bruiser				Betting Bruiser Tweets		

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AAI00000479	P	4/27/2021	4/27/2021	Tweets	Betting Bruiser							
AAI00000480	P	1/4/2021	1/4/2021	Invoice	Artemis Risk Consulting	Moez Kassam				Invoice ANS004	Yes	1. Privileged Information
AAI00000481	P	4/30/2021	4/30/2021	Presentation	Anson					Anson Funds - Overview presentation		
AAI00000482	P	11/24/2020	11/24/2020	Invoice	K2 Intelligence, LLC	Anson Advisors, Inc.				Invoice US-007358 re: Work Request #1	Yes	1. Privileged Information
AAI00000483	P	4/13/2021	4/13/2021	Tweets	Betting Bruiser and others							
AAI00000484	P	1/26/2021	1/26/2021	Invoice	Artemis Risk Consulting Ltd	Moez Kassam				Invoice ANS005	Yes	1. Privileged Information
AAI00000486	P	3/6/2021	3/6/2021	Twitter Feed	Betting Bruiser					Betting Bruiser Twitter Since October		
AAI00000488	P	3/2/2021	3/2/2021	Invoice	Artemis Risk Consulting Ltd					Invoice ANS006	Yes	1. Privileged Information
AAI00000489	P	4/30/2019	4/30/2019	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000491	P	3/29/2021	3/29/2021	Invoice	Artemis Risk Consulting Ltd					Invoice ANS007	Yes	1. Privileged Information
AAI00000492	P	4/30/2021	4/30/2021	Presentation	tmoore					Anson Funds - Overview presentation		
AAI00000493	P	5/5/2021	5/5/2021	Invoice	Artemis Risk Consulting Ltd	Moez Kassam				Invoice ANS009	Yes	1. Privileged Information
AAI00000494	P	8/31/2019	8/31/2019	Presentation	tmoore					Anson Funds - Overview presentation		
AAI00000496	P	9/17/2021	9/17/2021	Invoice	Artemis Risk Consulting Ltd	Moez Kassam				Invoice ANS11	Yes	1. Privileged Information
AAI00000497	P	9/30/2021	9/30/2021	Presentation	Anson Funds					Anson Funds - Overview presentation		
										HARVEST MOON DUE DILIGENCE Report – Cronos group INC.		
AAI00000500	P	9/14/2018	9/14/2018	Report	Cronos Group Inc.					Anson Funds - Overview presentation		
AAI00000503	P	12/31/2019	12/31/2019	Presentation	Anson Funds					The Green Organic Dutchman Disclosure Violations Matter		
AAI00000504	P	6/26/2018	6/26/2018	Report	Michael Miller					Anson Funds - Overview presentation		
AAI00000506	P	12/31/2020	12/31/2020	Presentation	Anson Funds							
					"Sunny Puri" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E77A63CDC3EE43C190D1C2BB2A76580E-SPURI>"							
AAI00000508	P	10/4/2020	10/4/2020	Email Message	"Sunny Puri" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E77A63CDC3EE43C190D1C2BB2A76580E-SPURI>"	"Ronnie Liu" <rliu@ansonfunds.com>"				FW: germany		
AAI00000509	A	10/4/2020	9/14/2018	Report	Cronos Group Inc.					HARVEST MOON DUE DILIGENCE Report – Cronos group INC.		
AAI00000511	P	10/24/2020	10/24/2020	WhatsApp Chat with Notes	Sunny Puri							
AAI00000512	P	12/31/2021	12/31/2021	Presentation	Anson Funds					Anson Funds - Overview presentation		
					"Sunny Puri" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E77A63CDC3EE43C190D1C2BB2A76580E-SPURI>"							
AAI00000513	P	10/4/2020	10/4/2020	Email Message	"Sunny Puri" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E77A63CDC3EE43C190D1C2BB2A76580E-SPURI>"	"Ronnie Liu" <rliu@ansonfunds.com>"				FW: TGOD		
AAI00000514	A	10/4/2020	6/26/2018	Report	Michael Miller					The Green Organic Dutchman Disclosure Violations Matter		
AAI00000518	P	2/28/2021	2/28/2021	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000520	P	2/28/2020	2/28/2020	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000526	P	7/31/2019	7/31/2019	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000527	P	12/30/2020	12/30/2020	Report	Ministry of Government Services (Ontario)					Corporation Profile Report - Harvest Moon Cannabis Compay Inc.		
AAI00000531	P	10/9/2020	10/9/2020	Chat						Betting Bruiser, Moez Kassam		
AAI00000532	P	6/17/2020	6/17/2020	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000533	P	12/24/2020	12/24/2020	Spreadsheet	Philmon Rezene					List of Websites and Webpages	Yes	1. Privileged Information
AAI00000534	P	7/6/2021	7/6/2021	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000538	P	9/29/2020	9/29/2020	Web Posts	Philmon Rezene					Moez, Anson and so what.		
AAI00000539	P	3/31/2019	3/31/2019	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000541	P	9/27/2020	9/27/2020	Web Post	cool888					Nothing to do with \$TUSK.... thought of passing it around		
AAI00000542	P	3/31/2021	3/31/2021	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000543	P	3/31/2019	3/31/2019	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000544	P	9/29/2020	9/29/2020	Tweets	Betting Bruiser							
AAI00000545	P	10/2/2020	10/2/2020	Reddit Web Posts	ResignedFate					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000546	P	5/31/2021	5/31/2021	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000547	P	11/30/2019	11/30/2019	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000548	P	11/30/2020	11/30/2020	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000549	P	10/31/2019	10/31/2019	Presentation	Anson Funds					Anson Funds - Overview presentation		
AAI00000550	P	6/28/2021	6/28/2021	Web Post	marketfrauds.to					Moez Kassam & Anson Funds Part II: Rotten To The Core		
AAI00000551	P	8/21/2020	8/21/2020	Web Post	Howling Mad Murdock					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure - Part 1		
AAI00000552	P	10/31/2020	10/31/2020	Presentation	Anson Funds					Anson Funds - Overview presentation		
										Moez Kassam has moved over \$20 million into offshore accounts in UAE and Dubai - Market Frauds		
AAI00000555	P	5/19/2020	5/19/2020	Web Post	marketfrauds.to					Anson Funds - Overview presentation		
AAI00000557	P	9/30/2019	9/30/2019	Presentation	Anson Funds					Moez Kassam has moved over \$20 million into offshore accounts in UAE and Dubai - Market Frauds		
AAI00000558	P	5/15/2020	5/15/2020	Web Post	marketfrauds.to					User Data 2021-07-01		
AAI00000561	P	7/1/2021	7/1/2021	Spreadsheet	Microsoft Office User					Anson Funds - Overview presentation		
AAI00000562	P	9/30/2022	9/30/2022	Presentation	Anson Funds					User Posts		
AAI00000563	P	6/29/2021	6/29/2021	Forum Posts in Excel Format	Microsoft Office User					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000565	P	9/27/2020	9/27/2020	Web Post	moezkassam.com					Online Tracker - 10.04.20.docx		
AAI00000566	P	10/4/2020	10/4/2020	Screenshots of Reddit Posts with Links	Philmon Rezene					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000568	P	9/25/2020	9/25/2020	Web Post	moezkassam.com					User Posts		
AAI00000569	P	7/5/2021	7/5/2021	Forum Posts in Excel Format	Microsoft Office User							

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AAI00000570	P		10/30/2020	10/30/2020	Screenshot of Reddit Posts with Links	Philmon Rezene					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000572	P		9/25/2020	9/25/2020	Web Post	www.stockmanipulators.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000573	P		12/23/2020	12/23/2020	Reddit Web Posts with Links	Philmon Rezene					Online Tracker		
AAI00000574	P		6/29/2021	6/29/2021	Spreadsheet	Microsoft Office User					User Profile Data 2021 06 29.		
AAI00000576	P		9/28/2020	9/28/2020	Web Post	freerepublic.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000578	P		10/7/2020	10/7/2020	Stockhouse Web Posts with Links	Philmon Rezene					Online Tracker not consolidated		
AAI00000579	P		10/4/2020	10/4/2020	Web Posts	ripoffreport.com					Complaint Review: Moez Kassam - Toronto		
AAI00000581	P		10/4/2020	10/4/2020	Web Post	marketinvestigations.org					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000583	P		10/7/2020	10/7/2020	Web Post	www.stockmanipulators.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000584	P		12/2/2020	12/2/2020	Stockhouse Web Posts with Links	Philmon Rezene					Stockhouse Tracker - 12.02.20		
AAI00000586	P		10/29/2020	10/29/2020	Web Post	marketcrimes.to					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000587	P		12/2/2020	12/2/2020	Stockhouse Web posts with Links	Philmon Rezene					Stockhouse Tracker - Serious posts		
AAI00000589	P		2/10/2021	2/10/2021	Web Post	marketfrauds.to					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000590	P		4/6/2021	4/6/2021	Text Messages	PresumablyPaul, Moez Kassam							
AAI00000592	P		9/30/2020	9/30/2020	Twitter Track	Philmon Rezene					Twitter track - September 30, 2020		
AAI00000594	P		4/6/2021	4/6/2021	Text Message	Paul					Hello Moez		
AAI00000596	P		4/7/2021	4/7/2021	Text Messages	Paul, Moez Kassam							
AAI00000598	P		4/7/2022	4/7/2022	Text Messages	Paul, Moez Kassam							
AAI00000599	P		6/18/2021	6/18/2021	Web Posts	Nitish Dang					Some more statements about Anson on Yahoo	Yes	1. Privileged Information
AAI00000601	P		4/9/2021	4/9/2021	Text Messages	Paul, Moez Kassam							
AAI00000603	P		4/12/2021	4/12/2021	Text Messages	Paul, Moez Kasam							
AAI00000605	P		3/8/2021	3/8/2021	List and Screenshots	Mark Baliwalla					Screenshots of Links wiht names without sunny posts.docx	Yes	1. Privileged Information
AAI00000606	P		4/12/2021	4/12/2021	Text Messages	Moez Kassam							
AAI00000608	P		3/10/2021	3/10/2021	Web Post with Comments	Mark Baliwalla					Anson Funds under SEC Investigation - Do Unitholders know?		
AAI00000609	P		4/12/2021	4/12/2021	Text Messages	Moez Kassam, Paul							
AAI00000611	P		3/17/2021	3/17/2021	List	Mark Baliwalla					Stockhouse Links - March 17	Yes	1. Privileged Information
AAI00000612	P		4/12/2021	4/12/2021	Text Message	Moez Kassam							
AAI00000613	P		6/5/2021	6/5/2021	Web Posts	Nitish Dang					Stockhouse New Links June 5		
AAI00000615	P		4/13/2021	4/13/2021	Text Messages	Paul, Moez Kassam							
AAI00000616	P		5/24/2021	5/24/2021	Stockhouse Web Posts	Nitish Dang					Active Links - Stockhouse		
AAI00000618	P		4/13/2021	4/13/2021	Text Messages	Moez Kassam, Paul							
AAI00000620	P		5/31/2021	5/31/2021	Stockhouse Web Posts	Nitish Dang					Active Links - Stockhouse		
AAI00000621	P		5/31/2021	5/31/2021	Stockhouse Web Posts	Nitish Dang					Active Links - Stockhouse		
AAI00000622	P		4/22/2021	4/22/2021	Text Messages	Moez Kassam	Paul						
AAI00000623	P		4/22/2021	4/22/2021	Text Messages	Moez Kassam, Paul							
AAI00000624	P		4/22/2021	4/22/2021	Text Messages	Moez Kassam, Paul							
AAI00000626	P		4/22/2021	4/22/2021	Text Messages	Moez Kassam, Paul							
AAI00000627	P		4/22/2021	4/22/2021	Text Messages	Moez Kassam, Paul							
AAI00000629	P		4/22/2021	4/22/2021	Text Messages	Moez Kassam, Paul							
AAI00000630	P		6/7/2021	6/7/2021	Spreadsheet	Mark Baliwalla					Sunny Stockhouse Data Summary		
AAI00000631	P		4/22/2021	4/22/2021	Text Messages	Paul, Moez Kassam							
AAI00000632	P		11/11/2020	11/11/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				MEMBER SUPPORT - Slandorous Posting in Breach of Stockhouse Policies *Time Sensitive*		
AAI00000633	P		8/28/2020	8/28/2020	Email Message	"Laura Salvatori" </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d7ab6589bd44c52adc76a76be851426-Laura Salva>"	"support@stockhouse.com" <support@stockhouse.com>"				ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00000634	P		8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"				(Post ID 31409654) - MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00000635	P		8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00000636	P		9/28/2020	9/28/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		

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AAI00000637	P	9/12/2020	9/12/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00000638	P	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d7ab6589bd44c52adc76a76be851426-Laura Salva>"	"Stockhouse Member Support" <support@stockhouse.com>"			TTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00000639	P	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"			(Post ID 31409558) - MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00000640	P	3/8/2021	3/8/2021	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Libelous Posting *Time Sensitive*		
AAI00000641	P	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00000642	P	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00000649	A	10/1/2020	10/1/2020	Spreadsheet	James Stafford				List of Editors		
AAI00000650	P	11/12/2021	11/12/2021	Email Message	"Danielle Hopely" <dhopely@webimax.com>	"Sunny Puri" <spuri@ansonfunds.com>		"Zubin Gada" <hi@zubingada.com>	RE: WebiMax Reputation Management		
AAI00000651	P	11/12/2021	11/12/2021	Email Message	"Danielle Hopely" <dhopely@webimax.com>	"Sunny Puri" <spuri@ansonfunds.com>		"Zubin Gada" <hi@zubingada.com>	RE: WebiMax Reputation Management		
AAI00000652	P	11/12/2021	11/12/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>	"Danielle Hopely" <dhopely@webimax.com>		"Zubin Gada" <hi@zubingada.com>	RE: WebiMax Reputation Management		
AAI00000655	A	9/28/2020	9/28/2020	Chat	Sunny Puri				bruiser vs spec conversations		
AAI00000656	A	10/1/2020	10/1/2020	Spreadsheet	James Stafford				List of Editors		
AAI00000657	A	4/15/2021	4/15/2021	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>"			FW: See Attachments		
AAI00000658	A	8/21/2020	8/21/2020	Draft Post	Howling Mad Murdock				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure - Part 1		
AAI00000659	A	8/21/2020	8/21/2020	Transcript of call	Josh Owens				1st Call – setting the stage but has some useful information		
AAI00000660	A	8/21/2020	8/21/2020	Transcript of call	Josh Owens				3rd Call – Lots of info		
AAI00000661	A	8/21/2020	8/21/2020	Transcript of call	Josh Owens				4th Call – more info		
AAI00000662	A	8/21/2020	8/21/2020	Transcript of call	Josh Owens				2nd Call – Bit more info before the big call		
AAI00000663	A	9/28/2020	9/28/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"			RE: Statement for Globe/ Next Steps	Yes	1. Privileged Information
AAI00000664	A	10/9/2020	10/9/2020	Chat	Moez Kassam, Betting Bruiser				Moez - Betting Bruiser Chat Extract		
AAI00000665	P	11/12/2021	11/12/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>	"Danielle Hopely" <dhopely@webimax.com>		"Zubin Gada" <hi@zubingada.com>	RE: WebiMax Reputation Management		
AAI00000666	P	11/12/2021	11/12/2021	Email Message	"Danielle Hopely" <dhopely@webimax.com>	"Sunny Puri" <spuri@ansonfunds.com>		"Zubin Gada" <hi@zubingada.com>	RE: WebiMax Reputation Management		
AAI00000668	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"info@benzinga.com" <info@benzinga.com>;"legal@benzinga.com" <legal@benzinga.com>;"editorial@benzinga.com" <editorial@benzinga.com>;"support@benzinga.com" <support@benzinga.com>"			*TIME SENSITIVE* Defamatory Article Hyperlinked on Benzinga		
AAI00000669	P	11/12/2021	11/12/2021	Email Message	"Zubin Gada" <hi@zubingada.com>	"Danielle Hopely" <dhopely@webimax.com>;"Sunny Puri" <spuri@ansonfunds.com>			RE: WebiMax Reputation Management		
AAI00000671	P	4/20/2021	4/20/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Afik Rechler" <afik@marketacross.com>;"Moez Kassam" <mkassam@ansonfunds.com>"		"Zubin Gada (hi@zubingada.com)" <hi@zubingada.com>"	RE: Moez Kassam <> InboundJunction - ORM Proposal and a Plan of action		
AAI00000675	P	11/12/2021	11/12/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>	"Danielle Hopely" <dhopely@webimax.com>		"Zubin Gada" <hi@zubingada.com>	RE: WebiMax Reputation Management		

						"info@benzinga.com" <info@benzinga.com>;"legal@benzinga.com" <legal@benzinga.com>;"editorial@benzinga.com" <editorial@benzinga.com>;"support@benzinga.com" <support@benzinga.com>"					
AAI00000677	A	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"					*TIME SENSITIVE* Defamatory Article Hyperlinked on Benzinga	
AAI00000679	P	11/12/2021	11/12/2021	Email Message	"Danielle Hopely" <dhopely@webimax.com>	"Sunny Puri" <spuri@ansonfunds.com>			"Zubin Gada" <hi@zubingada.com>	RE: WebiMax Reputation Management	
AAI00000682	P	11/12/2021	11/12/2021	Email Message	"Zubin Gada" <hi@zubingada.com>	"Danielle Hopely" <dhopely@webimax.com>;"Sunny Puri" <spuri@ansonfunds.com>				RE: WebiMax Reputation Management	
AAI00000683	P	5/17/2021	5/17/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"			"Sunny Puri" <spuri@ansonfunds.com>"	RE: *TIME SENSITIVE* CEASE AND DESIST - Copyright Infringement on Website hosted by AbeloHost	
AAI00000684	P	5/20/2021	5/20/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"			"Sunny Puri" <spuri@ansonfunds.com>"	RE: *TIME SENSITIVE* CEASE AND DESIST - COPYRIGHT INFRINGEMENT on Website hosted by AbeloHost	
AAI00000686	A	12/16/2020	12/16/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000687	A	8/14/2020	8/14/2020	Stockhouse Web Post	evtrader					Moez Kassam and Anson Funds - Short \$500 M And Lose It All	
AAI00000688	A	9/29/2020	9/29/2020	Web Posts	Daniela, Khalid2 and others					Message board similar posts	
AAI00000689	A	8/17/2020	8/17/2020	Stockhouse Web Posts	Bandyj					The Real story on what happened with Moez Kassam and Aphria	
AAI00000690	A	12/14/2020	12/14/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000694	P	11/9/2020	11/9/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000696	P	11/1/2021	11/1/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Gerard Toohey" <GToohey@ansonfunds.com>"				FW: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000698	P	12/16/2020	12/16/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000700	P	11/3/2020	11/3/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				*TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000701	A	11/3/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	
AAI00000702	A	11/3/2020	10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	
AAI00000703	A	11/3/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	
AAI00000704	A	11/3/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	
AAI00000705	A	11/3/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	
AAI00000707	P	11/5/2020	11/5/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000708	P	12/14/2020	12/14/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000709	P	11/4/2020	11/4/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000710	P	5/17/2021	5/17/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Zubin Gada" <hi@zubingada.com>"				FW: *TIME SENSITIVE* CEASE AND DESIST - Copyright Infringement on Website hosted by AbeloHost	
AAI00000712	P	3/12/2021	3/12/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuses@abelohost.net" <abuses@abelohost.net>;"admin@abelohost.nl" <admin@abelohost.nl>"				*TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by AbeloHost	
AAI00000713	A	3/12/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	
AAI00000714	A	3/12/2021	10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	
AAI00000715	A	3/12/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	
AAI00000716	A	3/12/2021	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	

SCHEDULE A

AAI00000717	A	3/12/2021	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000720	P	5/16/2021	5/16/2021	Email Message	"Web.com Abuse Support - Legal Support" <level3@web.com>"	"Laura Salvator" <lsalvatori@ansonfunds.com>"			Web.com - [tk:22447431] outline.com		
AAI00000721	P	10/8/2020	10/8/2020	Email Message	"Paul K (Compliance)" <compliance@tu cows.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			[Tu cows Inc - Compliance] Re: Spam - Re: *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00000723	P	9/29/2020	9/29/2020	Email Message	"ICANN-No Reply" <no-reply@icann.org>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>"			Your Recent Experience with the ICANN Support Center		
AAI00000729	A	12/7/2020	12/7/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			capitalmarketcrimes and marketcrimes - view count		
AAI00000730	A	11/13/2020	11/13/2020	Screenshot of Web Post Heading and Picture					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000733	P	10/1/2020	10/1/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			whois on stockmanipulator		
AAI00000736	P	9/28/2020	9/28/2020	Email Message	"Lee Weinstein" <lweinstein@newbridgeturing.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"			Re: I'm sure that you have this information but just in case.		
AAI00000737	P	10/9/2020	10/9/2020	Email Message	"LaunchPad (HostGator) Sales Department" <sales@launchpad.com>"	"bwinson@ansonfunds.com" <bwinson@ansonfunds.com>"			Reminder to verify the accuracy of Whois data for ansonomics.com		
AAI00000743	P	9/28/2020	9/28/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Charles Zhang" <c Zhang@ansonfunds.com>"			icann		
AAI00000744	P	10/9/2021	10/9/2021	Email Message	"LaunchPad (HostGator) Sales Department" <sales@launchpad.com>"	"bwinson@ansonfunds.com" <bwinson@ansonfunds.com>"			Reminder to verify the accuracy of Whois data for ansonomics.com		
AAI00000746	A	12/7/2020	12/7/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			capitalmarketcrimes and marketcrimes - view count		
AAI00000747	A	11/13/2020	11/13/2020	Screenshot of Web Post Heading and Picture					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000748	A	11/26/2020	11/26/2020	Screenshot of Web Post Heading and Picture					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00000751	A	9/27/2020	9/27/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00000755	P	9/28/2020	9/28/2020	Email Message	"MAILER-DAEMON@pechora3.dc.icann.org" <MAILER-DAEMON@pechora3.dc.icann.org>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>"			Successful Mail Delivery Report (autoresponse) *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00000758	P	10/8/2020	10/8/2020	Email Message	"compliance@opensrs.org" <compliance@opensrs.org>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>"			RE: I'm sure that you have this information but just in case.		
AAI00000760	P	9/28/2020	9/28/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Lee Weinstein" <lweinstein@newbridgeturing.com>"			Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00000766	A	9/27/2020	9/27/2020	Web Post	moezkassam.com				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000771	P	9/29/2020	9/29/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00000775	P	9/29/2020	9/29/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>"			*TIME SENSITIVE* Domain Name De-Registration Request - Breach of 15 § U.S.C. 8131		
AAI00000785	P	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"icann@icann.org" <icann@icann.org>"			Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00000786	A	9/28/2020	9/27/2020	Web Post	moezkassam.com				whois on capitalmarketcrimes		
AAI00000787	P	10/1/2020	10/1/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			A New Case Has Been Created - Case 00977514		
AAI00000789	P	9/28/2020	9/28/2020	Email Message	"Global Support Center" <no-reply@icann.org>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>"			(autoresponse) *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00000790	P	10/8/2020	10/8/2020	Email Message	"info@tu cows.com" <info@tu cows.com>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* Domain Name De-Registration Request - Breach of 15 § U.S.C. 8131 [ref: 00D616Uk_5004McwBWD:ref]		
AAI00000792	P	9/28/2020	9/28/2020	Email Message	"ICANN Global Support Center" <globalsupport@icann.org>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>"			Reminder to verify the accuracy of Whois data for ansonomics.com		
AAI00000794	P	10/9/2022	10/9/2022	Email Message	"LaunchPad (HostGator) Sales Department" <sales@launchpad.com>"	"bwinson@ansonfunds.com" <bwinson@ansonfunds.com>"					
AAI00000854	A	9/30/2020	9/30/2020	Statement	Laura Salvatori (Anson Funds)						
AAI00001099	P	10/5/2020	10/5/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Louise Lentino" <legal@instra.com>;"abuse@instra.com" <abuse@instra.com>"	"mkassam@ansonfunds.com" <mkassam@ansonfunds.com>;"spuri@ansonfunds.com" <spuri@ansonfunds.com>"		RE: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00001100	P	10/4/2020	10/4/2020	Email Message	"Louise Lentino" <legal@instra.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"abuse@instra.com" <abuse@instra.com>;"(IN) Distribution Group: Legal" <legal@instra.com>"			Re: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00001103	P	10/3/2020	10/3/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: It's back		

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AAI00001104	P		10/3/2020	10/3/2020	Email Message	"abuse@instra.com" <abuse@instra.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>				[Ticket#20201003416252400] *TIME SENSITIVE* BRE [...]		
AAI00001107	A		11/13/2020	11/13/2020	Screenshot of Web Post Title and Picture						Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001108	A		11/26/2020	11/26/2020	Screenshot of Web Post Title and Picture						Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001119	P		10/4/2020	10/4/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>				FW: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00001120	A		10/4/2020	10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"executiveresponse@endurance.com" <executiveresponse@endurance.com>				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001121	A		10/4/2020	9/28/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001124	P		10/5/2020	10/5/2020	Email Message	"abuse@instra.com" <abuse@instra.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>				[Ticket#20201005416256136] *TIME SENSITIVE* BRE [...]		
AAI00001138	P		10/3/2020	10/3/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"legal@instra.com" <legal@instra.com>;"abuse@instra.com" <abuse@instra.com>				RE: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00001143	P		10/3/2020	10/3/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"legal@instra.com" <legal@instra.com>				*TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00001148	A		10/5/2020	10/5/2020	Email Message	"Louise Lentino" <louisel@instra.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"abuse@instra.com" <abuse@instra.com>;"(IN) Distribution Group: Legal" <legal@instra.com>				Re: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00001154	P		10/5/2020	10/5/2020	Email Message	"Louise Lentino" <louisel@instra.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"abuse@instra.com" <abuse@instra.com>;"(IN) Distribution Group: Legal" <legal@instra.com>				Re: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00001155	P		10/4/2020	10/4/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"legal@instra.com" <legal@instra.com>;"abuse@instra.com" <abuse@instra.com>				RE: *TIME SENSITIVE* BREACH OF INSTRA ABUSE POLICY /DEFAMATORY CONDUCT		
AAI00001156	A		10/4/2020	10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"executiveresponse@endurance.com" <executiveresponse@endurance.com>				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001157	A		10/4/2020	9/28/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>				RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001161	P		11/9/2020	11/9/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Michelle Zatlyn" <michelle@cloudflare.com>			"Moez Kassam" <mkassam@ansonfunds.com>	RE: urgent help		
AAI00001164	P		11/9/2020	11/9/2020	Email Message	"Michelle Zatlyn" <michelle@cloudflare.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>			"Moez Kassam" <mkassam@ansonfunds.com>	Re: urgent help		
AAI00001165	P		11/9/2020	11/9/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Michelle Zatlyn" <michelle@cloudflare.com>			"Moez Kassam" <mkassam@ansonfunds.com>	Re: urgent help		
AAI00001167	P		11/5/2020	11/5/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Michelle Zatlyn" <michelle@cloudflare.com>	"Allen Lau" <allen@wattpad.com>		"Moez Kassam" <mkassam@ansonfunds.com>	RE: urgent help		
AAI00001168	P		3/13/2021	3/13/2021	Email Message	"Tonic Hostmaster" <hostmaster@tonic.to>	"Laura Salvatori" <lsalvatori@ansonfunds.com>				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00001181	P		10/5/2020	10/5/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>				RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00001183	P		9/27/2020	9/27/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>				Thank you for contacting us - Subject: Unlawful activity - https://moezkassam.com/		
AAI00001187	A		9/25/2020	9/25/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001188	A		9/25/2020	9/25/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001189	A		9/25/2020	9/25/2020	Web Post	moezkassam.com					Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001190	P		10/29/2020	10/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Allen Lau" <allen@wattpad.com>			"Moez Kassam" <mkassam@ansonfunds.com>	RE: urgent help		
AAI00001191	A		10/29/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001194	A		10/29/2020	10/6/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"PublicDomainRegistry.com" <abuse@publicdomainregistry.com>				RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00001196	A		10/29/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>				RE: Unlawful activity - https://moezkassam.com/		
AAI00001197	A		10/29/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>				Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001198	A		10/29/2020	10/3/2020	Web Page	capitalmarketcrimes.to					Capitalmarketcrimes.org Landing Page		
AAI00001204	P		9/27/2020	9/27/2020	Email Message	"abuse-contact@publicdomainregistry.com" <abuse-contact@publicdomainregistry.com>	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>				Acknowledgment Message		

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AAI00001216	P	9/27/2020	9/27/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuse- contact@publicdomainregistry.com" <abuse- contact@publicdomainregistry.com>"			RE: *TIME SENSITIVE* Defamatory Website under Public Domain Registry		
AAI00001217	P	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>,"abuse@ publicdomainregistry.com" <abuse@publicdomainregistry.com>"			RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00001223	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>"			RE: Unlawful activity - https://moezkassam.com/ Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001224	A	9/29/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001225	A	9/29/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001226	A	9/29/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001230	P	10/6/2020	10/6/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"PublicDomainRegistry.com" <abuse@publicdomainregistry.com>"			RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00001236	P	9/30/2020	9/30/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>"			RE: Unlawful activity - https://moezkassam.com/		
AAI00001237	P	10/6/2020	10/6/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"PublicDomainRegistry.com" <abuse@publicdomainregistry.com>"			Re: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00001245	P	10/5/2020	10/5/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: proton email	Yes	2. Confidential Information
AAI00001247	P	9/30/2020	9/30/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"PublicDomainRegistry.com" <tos@publicdomainregistry.com>,"abuse@ publicdomainregistry.com" <abuse@publicdomainregistry.com>"	"mkassam@ansonfunds.com" <mkassam@ansonfunds.com>,"spuri@an sonfunds.com" <spuri@ansonfunds.com>"		RE: Unlawful activity - https://moezkassam.com/ - Case #: 26130353		
AAI00001248	P	9/30/2020	9/30/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>,"Sunny Puri" <spuri@ansonfunds.com>"			FW: Unlawful activity - https://moezkassam.com/		
AAI00001253	P	10/4/2020	10/4/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001254	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>,"Sunny Puri" <spuri@ansonfunds.com>"			FW: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001255	P	10/29/2020	10/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"hostmaster@tonic.to" <hostmaster@tonic.to>"			*TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00001256	A	10/29/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001257	A	10/29/2020	10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001258	A	10/29/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001259	A	10/29/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001260	A	10/29/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001261	P	10/29/2020	10/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Allen Lau" <allen@wattpad.com>"		"Moez Kassam" <mkassam@ansonfunds.com>"	RE: urgent help		
AAI00001262	A	10/29/2020	10/8/2020	Email Message	"elliott noss" <enoss@tucows.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"		"Compliance" <compliance@opensrs.org>"	Re: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001263	A	10/29/2020	10/8/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"elliott noss" <enoss@tucows.com>"		"Compliance" <compliance@opensrs.org>"	RE: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001264	A	10/29/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001266	A	10/29/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001269	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001270	P	5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuse@web.com" <abuse@web.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	FW: CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001271	A	5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		

SCHEDULE A

AAI00001273	A	5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001274	A	5/14/2021	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001279	P	10/6/2020	10/6/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001282	P	10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Compliance" <compliance@opensrs.org>;"enoss@tuco ws.com" <enoss@tu cows.com>"			RE: [Tucows Inc - Compliance] Re: *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001283	A	10/8/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001284	P	10/4/2020	10/4/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001285	P	10/8/2020	10/8/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001286	P	10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"elliott noss" <enoss@tucows.com>"		"Compliance" <compliance@opensrs.org>"	RE: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001292	P	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"jeff.fox@endurance.com" <jeff.fox@endurance.com>;"david@endura nce.com" <david@endurance.com>"		"legal@endurance.com" <legal@endurance.com>"	RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001293	P	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"david@endurance.com" <david@endurance.com>;"legal@enduran ce.com" <legal@endurance.com>"		"jeff.fox@endurance.com" <jeff.fox@endurance.com>"	*TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001299	A	11/14/2022	11/14/2022	Email Message					Reddit Post Removal Request		
AAI00001301	A	11/14/2022	11/14/2022	Email Message					Reddit Post Removal Request		
AAI00001302	A	10/8/2020	10/8/2020	Email Message	"elliott noss" <enoss@tucows.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"		"Compliance" <compliance@opensrs.org>"	Re: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001303	A	10/1/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001304	A	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001305	A	9/28/2020	9/28/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00001306	A	10/1/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001307	A	10/6/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001308	A	10/29/2020	10/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Reddit Support" <support+id3729551@reddit.zendesk.com >"			RE: Repost of Defamatory Content that has been Removed by Registrar (Breach of 15 § U.S.C. 8131)		
AAI00001309	A	10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"elliott noss" <enoss@tucows.com>"		"Compliance" <compliance@opensrs.org>"	RE: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001310	A	10/1/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001311	A	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001312	A	10/6/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001313	A	9/30/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001314	A	9/25/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001315	A	9/30/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001316	A	10/8/2020	10/8/2020	Email Message	"elliott noss" <enoss@tucows.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"		"Compliance" <compliance@opensrs.org>"	Re: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001322	A	10/29/2020	10/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Reddit Support" <support+id3729551@reddit.zendesk.com >"			RE: Repost of Defamatory Content that has been Removed by Registrar (Breach of 15 § U.S.C. 8131)		

AAI00001328	A	9/25/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001335	P	5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"abusecomplaints@markmonitor.com" <abusecomplaints@markmonitor.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Sites for Which You Serve as Registrar		
AAI00001342	P	9/29/2020	9/29/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001343	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"			FW: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	Yes	1. Privileged Information
AAI00001344	P	11/9/2020	11/9/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"wongjen75@gmail.com" <wongjen75@gmail.com>"			RE: Introduction		
AAI00001345	A	11/9/2020	10/8/2020	Email Message	"elliott noss" <enoss@tucows.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"		"Compliance" <compliance@opensrs.org>"	Re: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001346	A	11/9/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001347	A	11/9/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001348	A	11/9/2020	9/28/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00001349	A	11/9/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001350	A	11/9/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001351	A	11/9/2020	10/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Reddit Support" <support+id3729551@reddit.zendesk.com>"			RE: Repost of Defamatory Content that has been Removed by Registrar (Breach of 15 § U.S.C. 8131)		
AAI00001352	A	11/9/2020	10/8/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"elliott noss" <enoss@tucows.com>"		"Compliance" <compliance@opensrs.org>"	Re: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001353	A	11/9/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001354	A	11/9/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001355	A	11/9/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001356	A	11/9/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001357	A	11/9/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001358	A	11/9/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001359	P	10/19/2020	10/19/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001360	P	5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"abuse@epik.com" <abuse@epik.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001361	A	5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001362	A	5/14/2021	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001363	A	5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001364	A	5/14/2021	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001365	A	5/14/2021	12/17/2020	Court Document	Anson Advisors Inc. et al	Robert Doxtator et al			Statement of Claim		
AAI00001366	A	5/14/2021	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001368	P	9/28/2020	9/28/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		

AAI00001370	A	10/1/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001371	A	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001372	A	10/6/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001373	A	9/30/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001380	A	11/14/2022	11/14/2022	Email Message					Reddit Post Removal Request		
AAI00001381	A	10/8/2020	10/8/2020	Email Message	"elliot noss" <enoss@tucows.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"		"Compliance" <compliance@opensrs.org>"	Re: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001383	A	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001384	A	9/28/2020	9/28/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00001385	A	10/1/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001386	A	10/6/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001387	A	10/29/2020	10/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Reddit Support" <support+id3729551@reddit.zendesk.com>"			RE: Repost of Defamatory Content that has been Removed by Registrar (Breach of 15 § U.S.C. 8131)		
AAI00001388	A	10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"elliot noss" <enoss@tucows.com>"		"Compliance" <compliance@opensrs.org>"	Re: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00001389	A	10/1/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001390	A	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001391	A	10/6/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001392	A	9/30/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001393	A	9/25/2020	9/25/2020	Web Post	moezkassam				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00001394	A	9/30/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001402	A	10/28/2020	10/28/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: Details of Defamatory Postings		
AAI00001407	A	8/14/2020	8/14/2020	Web Post	evtrader				Post Number 31409659 - Moez Kassam and Anson Funds - Short \$500 M And Lose It All		
AAI00001408	A	7/23/2020	7/23/2020	Web Post	JusInTime				Post Number 31307009 - The Real Story on Moez Kassam and Anson Funds — Part 1		
AAI00001409	A	8/25/2020	8/25/2020	Web Post	maplesyrumpoan				Post Number 31451382		
AAI00001410	A	8/28/2020	8/28/2020	Stockhouse Web Post					Post Number 31470222		
AAI00001411	A	10/17/2020	10/17/2020	Web Post	Bundyj				Post Number 31419651 - The Real story on what happened with Moez Kassam and Aphria		
AAI00001413	A	10/20/2020	10/20/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001414	A	10/26/2020	10/26/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Details of Defamatory Postings		
AAI00001425	P	10/26/2020	10/26/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Details of Defamatory Postings		
AAI00001426	A	10/26/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001427	A	10/26/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001428	A	10/26/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		

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AAI00001429	A	10/26/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001430	A	10/26/2020	10/14/2020	Web Page	evtrader				Post Number 31409659 - The Real story on what happened with Moez Kassam and Aphria		
AAI00001431	A	10/26/2020	7/23/2020	Web Page	JusInTime				Post Number 31307009 - The Real Story on Moez Kassam and Anson Funds — Part 1		
AAI00001432	A	10/26/2020	8/25/2020	Stockhouse Web Post	maplesyrucan				Post Number 31451382		
AAI00001433	A	10/26/2020	8/28/2020	Stockhouse Web Post					Post Number 31470222		
AAI00001434	A	10/26/2020	8/17/2020	Web Post	Budyj				Post Number 31419651 - The Real story on what happened with Moez Kassam and Aphria		
AAI00001435	A	10/26/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001441	P	10/4/2020	10/4/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"			FW: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001448	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001454	P	10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001457	P	10/20/2020	10/20/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001490	P	10/20/2020	10/20/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001491	P	10/11/2020	10/11/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001495	P	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"eig-net-team@endurance.com" <eig-net-team@endurance.com>;"eig-noc@endurance.com" <eig-noc@endurance.com>;"abuse@bluehost.com" <abuse@bluehost.com>;"abuse@unifiedlayer.com" <abuse@unifiedlayer.com>;"jayanathan.muhunthan@endurance.com" <jayanathan.muhunthan@endurance.com>;"privacy@endurance.com" <privacy@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001497	P	10/22/2020	10/22/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Reddit Support" <support+id3729551@reddit.zendesk.com>"			RE: Repost of Defamatory Content that has been Removed by Registrar (Breach of 15 § U.S.C. 8131)		
AAI00001498	A	10/22/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001499	A	10/22/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001500	A	10/22/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001501	A	10/22/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001502	A	10/22/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001503	P	10/1/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"			FW: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001504	A	10/1/2020	10/1/2020	Web Post	www.stockmanipulators.com				Stock Manipulators - Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001505	A	10/1/2020	9/25/2020	Web Post	www.stockmanipulators.com				Stock Manipulators - Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001506	A	10/1/2020	10/27/2020	Web Post	www.stockmanipulators.com				Stock Manipulators - Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001508	P	5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"abuse@amazonaws.com" <abuse@amazonaws.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	RE: CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001509	A	5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		

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AAI00001510	A	5/14/2021	10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001511	A	5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001512	A	5/14/2021	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001513	A	5/14/2021	12/17/2020	Court Document	Anson Advisors Inc. et al	Robert Doxtator et al			Statement of Claim		
AAI00001514	A	5/14/2021	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001515	P	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001517	P		10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001518	P	9/29/2020	9/29/2020	Email Message	"Microsoft Outlook" <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@ANSONGROUPCANA.DA.onmicrosoft.com>"	lsalvatori@ansonfunds.com			Undeliverable: RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001519	A	9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"		"abuse-contact@publicdomainregistry.com" <abuse-contact@publicdomainregistry.com>"	RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001520	A	9/29/2020	9/29/2020	Technical Report					Failed Delivery Report		
AAI00001523	A	5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuse@epik.com" <abuse@epik.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001524	A		10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001525	A		10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001526	A		10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001527	A		10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001528	A		12/17/2020	Court Document	Anson Advisors Inc. et al	Robert Lee Doxtator et al			Statement of Claim		
AAI00001529	A		9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001530	A		5/14/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuse@web.com" <abuse@web.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	FW: CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001531	A		10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001532	A		10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001533	A		10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001534	A		10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001535	A		12/17/2020	Court Document	Anson Advisors Inc. et al	Robert Lee Doxtator et al			Statement of Claim		
AAI00001536	A		9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001537	A		5/14/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuse@epik.com" <abuse@epik.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	RE: CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001538	A		5/14/2021	Email Message	"removals@google.com" <removals@google.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: [5-2715000031669] Your Request to Google		
AAI00001539	A		1/1/1900	Web Page	Moez Kassam				Classic - My Photos		
AAI00001540	A		5/14/2021	Email Message	"Abuse" <abuse@web.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Automatic reply: CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001541	A		5/14/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"abuse@amazonaws.com" <abuse@amazonaws.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	RE: CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001548	A		5/14/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"isnic@isnic.is" <isnic@isnic.is>"		"Sunny Puri" <spuri@ansonfunds.com>"	CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		

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AAI00001556	P		9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"			FW: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001558	P		10/2/2020	10/2/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Dov Lando" <dov@crawfordlakecapital.com>"			RE: Introduction...		
AAI00001559	A		10/2/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001560	A		10/2/2020	9/28/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001564	A		5/14/2021	5/14/2021	Email Message	"ec2-abuse@amazon.com" <ec2-abuse@amazon.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Amazon Web Services: You have submitted a new report [56346730012]		
AAI00001565	A		5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"abuse@amazonaws.com" <abuse@amazonaws.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001566	A		5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001567	A		5/14/2021	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001568	A		5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001569	A		5/14/2021	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001570	A		5/14/2021	12/17/2020	Court Document	Anson Advisors Inc. et al	Robert Doxtator et al			Statement of Claim		
AAI00001571	A		5/14/2021	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001572	A		5/14/2021	5/14/2021	Email Message	"Reddit Support" <support@reddit.zendesk.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			re: https://www.reddit.com/r/BurnedByAnsonFunds/comments/mdso2w/where_is_moez_kassam_part_2/		
AAI00001573	A		5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"contact@reddit.com" <contact@reddit.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	Anson Funds - Harassing and Defamatory Content on Reddit		
AAI00001574	A		5/14/2021	12/17/2020	Court Document	Anson Advisors Inc. et al	Robert Doxtator et al			Statement of Claim		
AAI00001575	A		5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"abusecomplaints@markmonitor.com" <abusecomplaints@markmonitor.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Sites for Which You Serve as Registrar		
AAI00001576	A		5/14/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001582	A		5/14/2021	5/14/2021	Email Message	"Reddit Support" <contact@reddit.zendesk.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			This email address is no longer monitored; please use our contact form		
AAI00001584	P		9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001636	P		9/28/2020	9/28/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"eig-net-team@endurance.com" <eig-net-team@endurance.com>;"eig-noc@endurance.com" <eig-noc@endurance.com>;"abuse@bluehost.com" <abuse@bluehost.com>;"abuse@unifiedlayer.com" <abuse@unifiedlayer.com>;"jayanathan.muhunthan@endurance.com" <jayanathan.muhunthan@endurance.com>;"privacy@endurance.com" <privacy@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001637	P		10/5/2020	10/5/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001638	P		10/5/2020	10/5/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001639	P		10/5/2020	10/5/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001641	P		10/11/2020	10/11/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001642	P		9/30/2020	9/30/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001643	P		9/29/2020	9/29/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		

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AAI00001653	P		11/4/2020	11/4/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"hi@outline.com" <hi@outline.com>"			*TIME SENSITIVE* CEASE AND DESIST - Defamatory Website reposted by Outline		
AAI00001654	A		11/4/2020	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001655	A		11/4/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001656	A		11/4/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001657	A		11/4/2020	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001658	A		11/4/2020	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001665	P		10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001666	P		9/29/2020	9/29/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001668	P		5/17/2021	5/17/2021	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"kvtanir@isnic.is" <kvtanir@isnic.is>"		"Sunny Puri" <spuri@ansonfunds.com>"	RE: [ISNIC #194872] Abuse notice reg. 'archive.is'		
AAI00001669	A		5/17/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001670	A		5/17/2021	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001671	A		5/17/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001672	A		5/17/2021	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001673	A		5/17/2021	12/17/2020	Court Document	Anson Advisors Inc. et al	Robert Doxtator et al			Statement of Claim		
AAI00001674	A		5/17/2021	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001676	P		10/4/2020	10/4/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001679	P		9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"		"abuse-contact@publicdomainregistry.com" <abuse-contact@publicdomainregistry.com>"	RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001681	P		5/18/2021	5/18/2021	Email Message	"abusecomplaints" <abusecomplaints@markmonitor.com>"	"lsvatori@ansonfunds.com" <lsvatori@ansonfunds.com>"			FW: CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Sites for Which You Serve as Registrar		
AAI00001688	P		9/29/2020	9/29/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001689	A		9/29/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001690	A		9/29/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001691	A		9/29/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001697	P		9/28/2020	9/28/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001699	P		10/1/2020	10/1/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001700	A		10/1/2020	9/25/2020	Web Post	www.stockmanipulators.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001701	A		10/1/2020	9/25/2020	Web Post	www.stockmanipulators.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001702	A		10/1/2020	9/27/2020	Web Post	www.stockmanipulators.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00001703	P		5/14/2021	5/14/2021	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"abuse@amazonaws.com" <abuse@amazonaws.com>"		"Sunny Puri" <spuri@ansonfunds.com>"	CEASE AND DESIST - Defamatory Website Promoting Violence and Harassment by Your Customer		
AAI00001713	P		10/28/2020	10/28/2020	Email Message	"Laura Salvatori" <lsvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: Details of Defamatory Postings		
AAI00001725	P		5/23/2021	5/23/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Zubin Gada" <hi@zubingada.com>"			FW: *TIME SENSITIVE* CEASE AND DESIST - COPYRIGHT INFRINGEMENT on Website for which Tonic serves as Registrar		

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AAI00001728	P		5/20/2021	5/20/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"hostmaster@tonic.to" <hostmaster@tonic.to>"		"Sunny Puri" <spuri@ansonfunds.com>"	RE: *TIME SENSITIVE* CEASE AND DESIST - COPYRIGHT INFRINGEMENT on Website for which Tonic serves as Registrar		
AAI00001733	P		10/30/2020	10/30/2020	Email Message	"Tonic Hostmaster" <hostmaster@tonic.to>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00001744	P		3/12/2021	3/12/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"hostmaster@tonic.to" <hostmaster@tonic.to>"			*TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00001745	A		3/12/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001746	A		3/12/2021	10/1/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"executiveresponse@endurance.com" <executiveresponse@endurance.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001747	A		3/12/2021	10/1/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001748	A		3/12/2021	10/6/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001749	A		3/12/2021	9/30/2020	Email Message	"noreply@salesforce.com" <noreply@salesforce.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance		
AAI00001752	P		10/29/2020	10/29/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"hostmaster@tonic.to" <hostmaster@tonic.to>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00001763	P		10/30/2020	10/30/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Tonic Hostmaster" <hostmaster@tonic.to>"			RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website hosted by Tonic		
AAI00001765	P		5/21/2021	5/21/2021	Email Message	"Tonic Hostmaster" <hostmaster@tonic.to>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: *TIME SENSITIVE* CEASE AND DESIST - COPYRIGHT INFRINGEMENT on Website for which Tonic serves as Registrar		
AAI00001804	P		11/2/2020	11/2/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Allen Lau" <allen@wattpad.com>"			RE: urgent help		
AAI00001805	P		10/29/2020	10/29/2020	Email Message	"Allen Lau" <allen@wattpad.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"		"Moez Kassam" <mkassam@ansonfunds.com>"	Re: urgent help		
AAI00001807	P		10/29/2020	10/29/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Allen Lau" <allen@wattpad.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: urgent help		
AAI00001808	P		11/9/2020	11/9/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Ash Mathur" <ash@cloudflare.com>"		"Samuel Noble" <samuel@cloudflare.com>;"Moez Kassam" <mkassam@ansonfunds.com>"	RE: Laura / Moez meet Sam (Cloudflare) / Sam meet Laura / Moez (Anson Funds)		
AAI00001822	P		11/9/2020	11/9/2020	Email Message	"Samuel Noble" <samuel@cloudflare.com>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>;"mkassam @ansonfunds.com" <mkassam@ansonfunds.com>"		"Michelle Zatlyn" <michelle@cloudflare.com>"	Re: Laura / Moez meet Sam (Cloudflare) / Sam meet Laura / Moez (Anson Funds)		
AAI00001920	P		11/13/2020	11/13/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>;"Tony Moore" <tmoore@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"			FW: Anson Funds & Cloudflare - follow-up		
AAI00001979	P		11/9/2020	11/9/2020	Email Message	"Michelle Zatlyn" <michelle@cloudflare.com>"	"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>;"mkassam @ansonfunds.com" <mkassam@ansonfunds.com>;"Samuel Noble" <samuel@cloudflare.com>"			Laura / Moez meet Sam (Cloudflare) / Sam meet Laura / Moez (Anson Funds)		
AAI00002298	P		10/8/2020	10/8/2020	Email Message	"Compliance" <compliance@opensrs.org>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			[Request received] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00002299	P		10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"compliance@opensrs.org" <compliance@opensrs.org>;"info@tucows.com" <info@tucows.com>;"disputes@opensrs.org" <disputes@opensrs.org>;"enoss@tucows.com" <enoss@tucows.com>"			Re: *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00002300	P		10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"elliott noss" <enoss@tucows.com>"		"Compliance" <compliance@opensrs.org>"	RE: [Tucows Inc - Compliance] *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00002301	A		10/8/2020	10/5/2020	Email Message	info@stockmanipulators.org	Hamida Sachedina			Huge Hedge Fund Scandal n Huge Hedge Fund Scandal in Canada and the US: Moez Kassam and Anson Funds Accused of Stealing Billions		
AAI00002302	P		10/8/2020	10/8/2020	Email Message	"Tucows GDPR Team (Compliance)" <compliance@opensrs.org>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			[Tucows Inc - Compliance] Re: *TIME SENSITIVE* BREACH OF ABUSE POLICY /DEFAMATORY CONDUCT www.marketcrimes.ws		

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AAI00002304	P	10/8/2020	10/8/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"compliance@opensrs.org" <compliance@opensrs.org>;"info@tu cows. com" <info@tu cows.com>;"disputes@opensrs.or g" <disputes@opensrs.org>"			*TIME SENSITIVE* BREACH OF ABUSE POLICY / DEFAMATORY CONDUCT www.marketcrimes.ws		
AAI00002934	P	10/1/2020	10/1/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Dean Marks" <deanm@taylorinc.com>;"Luigi Calabrese" <lcalabrese@frontiernetworks.ca>;"Allen Lau" <allen@wattpad.com>;"Gene Woodbridge" <gene@earthboring.ca>;"Sean Hickey" <shickey@lafertna.com>;"Steven Tuchner" <steven@triumphasset.com>;"Jason Birnb oim (jason@beauxproperties.com)" <jason@beauxproperties.com>"			Anson response to anonymous attack		
AAI00002935	A	9/30/2020	9/30/2020	Statement	Laura Salvatori (Anson Funds)						
AAI00004521	P	12/14/2020	12/14/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"			RE: Threatening Posts Removal Request		
AAI00004522	A	12/14/2020	9/30/2020	Web Post	RainbowRunner				Re:Is this the guy that attacked cannabis stocks in good years?		
AAI00004523	A	12/14/2020	10/29/2020	Web Post	gottahunch				RE:Looks like the Moez Kassam Report is back up guys		
AAI00004538	P	2/5/2021	2/5/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			Re: Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004544	P	4/7/2021	4/7/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfe r, Kaley" <kaley.pulfer@blakes.com>"	Re: RE: Correspondence from Blakes/Anson Funds		
AAI00004562	P	8/18/2020	8/18/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			RE: ATTN: MEMBER SUPPORT - Sland erous Posting *Time Sensitive*		
AAI00004585	P	12/6/2020	12/6/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"	"Dan.jennings@stockhouse.com" <Dan.jennings@stockhouse.com>"		Re: Threatening Posts Removal Request		
AAI00004595	A	11/1/2020	11/1/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			FW: Betting bruiser		
AAI00004596	A	1/1/1900	1/1/1900	Tweet	Betting Bruiser						
AAI00004597	A	4/28/2016	4/28/2016	Twitter Thread	Brittany (Britbrat2008), Betting Bruiser						
AAI00004598	A	2/28/2016	2/28/2016	Twitter Thread	Betting Bruiser, Blockchain Mahoovin						
AAI00004599	A	7/9/2016	7/9/2016	Tweets	Betting Bruiser, velvetyoonji						
AAI00004600	A	10/9/2014	10/9/2014	Tweet	Betting Bruiser						
AAI00004601	A	7/9/2016	7/9/2016	Tweets	Betting Bruiser, velvetyoonji						
AAI00004602	A	5/16/2013	5/16/2013	Tweets	Izi (mma_inciter), Betting Bruiser						
AAI00004603	A	10/9/2014	10/9/2014	Tweets	Sunny Puri				Appendix A - Bruiser tweets		
AAI00004613	A	9/28/2020	9/28/2020	Stockhouse Web Page					Facedrive Inc.		
AAI00004614	A	8/14/2020	8/14/2020	Stockhouse Web Post	evtrader				Moez Kassam and Anson Funds - Short \$500 M And Lose It All		
AAI00004615	A	9/28/2020	9/28/2020	Stockhouse Web Posts	Jamestango				Moez, Anson and so what.		
AAI00004617	A	9/27/2020	9/27/2020	Stockhouse Web Page	Stockhouse				Facedrive Inc.		
AAI00004618	A	3/18/2021	3/18/2021	List and Web Posts	Mark Baliwalla				Previously Found Links		
AAI00004619	A	9/27/2020	9/27/2020	Stockhouse Web Posts	cool888				Nothing to do with \$TUSK...thought of passing it around		
AAI00004620	A	8/25/2020	8/25/2020	Stockhouse Web Post	maplesyrupcan				Why did Mo... Anson Fund help put the GFL Short Report		
AAI00004621	A	8/17/2020	8/17/2020	Stockhouse Web Post	Mundyj				The Real story on what happened with Moez Kassam and Aphria		
AAI00004622	A	9/27/2020	9/27/2020	Stockhouse Web Post					[illegible]		
AAI00004623	A	9/28/2020	9/28/2020	Yahoo Web Posts	Randolph				Posts on WEED.TO/community		
AAI00004624	A	8/30/2020	8/30/2020	Web Posts	BrianA and others				Aphria Inc.		
AAI00004625	A	8/28/2020	8/28/2020	Stockhouse Web Post					Moez Kassam and Anson at it again - you guys got off lightly		
AAI00004626	A	8/28/2020	8/28/2020	Stockhouse Web Post	stocknsyrup				Moez Kassam and Anson at it again - you guys got off lightly		
AAI00004645	P	4/23/2021	4/23/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Sunny Puri" <spuri@ansonfunds.com>"		"Moez Kassam" <mkassam@ansonfunds.com>"	Re: Correspondence from Blakes/Anson Funds	Yes	1. Privileged Information
AAI00004648	A	3/18/2021	3/18/2021	List and Web Posts	Mark Baliwalla				Previously Found Links		
AAI00004649	A	9/27/2020	9/27/2020	Web Posts	cool888				Nothing to do with \$TUSK... thought of passing it around		
AAI00004650	A	3/7/2021	3/7/2021	Web Posts	Mark Baliwalla				Anson Funds under SEC Investigation - Do Unitholders know?		
AAI00004651	A	12/24/2020	12/24/2020	Web Posts	ControlPlusZ				Was SHRM the Victim of a Shady Hedge Fund?		

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AAI00004653	A	11/11/2020	11/11/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				MEMBER SUPPORT - Slandorous Posting in Breach of Stockhouse Policies *Time Sensitive"		
AAI00004654	A	8/28/2020	8/28/2020	Email Message	"Laura Salvatori" </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d7ab6589bd44c52adc76a76be851426-Laura Salva>"	"support@stockhouse.com" <support@stockhouse.com>"				ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004655	A	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"				(Post ID 31409654) - MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004656	A	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004657	A	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004658	A	9/12/2020	9/12/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				RE: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004659	A	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d7ab6589bd44c52adc76a76be851426-Laura Salva>"	"Stockhouse Member Support"" <support@stockhouse.com>"				TTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004660	A	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"				(Post ID 31409558) - MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004661	A	3/8/2021	3/8/2021	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				RE: ATTN: MEMBER SUPPORT - Libelous Posting *Time Sensitive"		
AAI00004662	A	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"				ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004663	A	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"				ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive"		
AAI00004665	A	12/2/2020	12/2/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"				Threatening Posts Removal Request		
AAI00004666	A	9/30/2020	9/30/2020	Web Post	RaiinbowRunner					RE:Is this the guy that attacked cannabis stocks in good years?		
AAI00004667	A	10/29/2020	10/29/2020	Web Post	gottahunch					RE:Looks like the Moez Kassam Report is back up guys		
AAI00004668	A	10/7/2020	10/7/2020	Web Post	shooter300					Have anyone else seen this???		
AAI00004669	A	10/7/2020	10/7/2020	Web Post	shooter300					Have anyone else seen this???		
AAI00004674	A	12/23/2020	12/23/2020	Web Post	DeRoon					Fund Behind Cormark Securities \$800k SEC fine was Anson Fund		
AAI00004675	P	3/10/2021	3/10/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"				Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004679	A	12/7/2020	12/7/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"			"Dan Jennings" <dan.jennings@stockhouse.com>"	RE: Threatening Posts Removal Request		
AAI00004683	A	4/20/2021	4/20/2021	Web Post	NemeCan					Anson Funds are the major short behind Reco's sell off		

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AAI00004692	P	12/17/2020	12/17/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			RE: Threatening Posts Removal Request		
AAI00004694	A	12/17/2020		Portable Network Graphics (PNG)							
AAI00004698	A	12/24/2020	12/24/2020	Web Posts	ControlPlusZ				Was SHRM the Victim of a Shady Hedge Fund?		
AAI00004699	P	1/12/2021	1/12/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004700	A	1/12/2021	9/30/2020	Web Post	RainbowRunner				RE:Is this the guy that attacked cannabis stocks in good years?		
AAI00004703	A	10/20/2020	10/20/2020	Reddit Request Form	Laura Salvatori				Submit a request		
AAI00004705	P	12/21/2020	12/21/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004708	P	3/25/2021	3/25/2021	Email Message	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>"	"Gary.Kelly@stockhouse.com" <Gary.Kelly@stockhouse.com>"		"support@stockhouse.com" <support@stockhouse.com>;"bullboards@stockhouse.com" <bullboards@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	Correspondence from Blakes/Anson Funds		
AAI00004709	A	3/25/2021	3/18/2021	Letter	Iris Fischer (Blakes)	Gary Kelly (Stockhouse Publishing Ltd.)			Abusive Content about Anson Funds on Stockhouse		
AAI00004710	A	3/25/2021	3/25/2021	Letter	Iris Fischer (Blakes)	Gary Kelly (Stockhouse Publishing Ltd.)			Abusive Content about Anson Funds on Stockhouse		
AAI00004718	P	3/18/2021	3/18/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"			FW: Correspondence from Blakes/Anson Funds		
AAI00004719	A	3/18/2021	3/18/2021	Letter	Iris Fischer (Blakes)	Gary Kelly (Stockhouse Publishing Ltd.)			Abusive Content about Anson Funds on Stockhouse		
AAI00004728	P	4/19/2021	4/19/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	Re: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00004739	P	3/8/2021	3/8/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			Re: Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004742	P	4/26/2021	4/26/2021	Email Message	"Fischer, Iris" <iris.fischer@blakes.com>"	"Stockhouse Member Support" <support@stockhouse.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	RE: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00004743	A	4/26/2021	4/26/2021	Spreadsheet					List of Previously Flagged Posts		
AAI00004745	P	2/8/2021	2/8/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004757	P	2/1/2021	2/1/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004761	P	9/12/2020	9/12/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004776	P	12/28/2020	12/28/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004787	P	12/14/2020	12/14/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			RE: Threatening Posts Removal Request		
AAI00004790	P	8/18/2020	8/18/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004836	A	11/11/2020	11/11/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			MEMBER SUPPORT - Slanderous Posting in Breach of Stockhouse Policies *Time Sensitive*		
AAI00004837	A	8/28/2020	8/28/2020	Email Message	"Laura Salvatori" </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d7ab6589bd44c52adc76a76be851426-Laura Salva>"	"support@stockhouse.com" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004838	A	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"			(Post ID 31409654) - MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		

AAI00004839	A	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004840	A	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004841	A	9/12/2020	9/12/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004842	A	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d7ab6589bd44c52adc76a76be851426-Laura Salva>"	"Stockhouse Member Support" <support@stockhouse.com>"			TTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004843	A	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"			(Post ID 31409558) - MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004844	A	3/8/2021	3/8/2021	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Libelous Posting *Time Sensitive*		
AAI00004845	A	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"Stockhouse Member Support" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004846	A	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2D7AB6589BD44C52ADC76A76BE851426-LAURA SALVA>"	"support@stockhouse.com" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004862	P	3/18/2021	3/18/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004872	P	6/11/2021	6/11/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <l salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	Re: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00004877	A			Portable Network Graphics (PNG)							
AAI00004883	P	12/2/2020	12/2/2020	Email Message	"Stockhouse Bullboards" <bullboards@stockhouse.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			Re: Threatening Posts Removal Request		
AAI00004896	P	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" <l salvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004903	P	3/19/2021	3/19/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			Fwd: Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004943	P	4/26/2021	4/26/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <l salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	Re: RE: RE: Correspondence from Blakes/Anson Funds		

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AAI00004947	A	6/11/2021	6/11/2021	Email Message	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>"	"Fischer, Iris" <iris.fischer@blakes.com>;"Stockhouse Member Support" <support@stockhouse.com>;"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	RE: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00004948	A	6/11/2021	6/11/2021	Court Document	McEwen J.	Counsel			File/Direction/Order		
AAI00004949	A	6/11/2021	6/11/2021	Court Document	McEwen J.				Order		
AAI00004954	A	4/21/2021	4/21/2021	Email Message	"Fischer, Iris" <iris.fischer@blakes.com>"	"Stockhouse Member Support" <support@stockhouse.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	RE: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00004974	P	9/28/2020	9/28/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00004978	P	12/8/2020	12/8/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"help@stockhouse.com" <help@stockhouse.com>"			FW: Threatening Posts Removal Request		
AAI00004984	P	12/28/2020	12/28/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004990	P	4/23/2021	4/23/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	Re: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00004992	P	3/9/2021	3/9/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00004999	A	8/31/2020	8/31/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005000	A	8/31/2020	8/31/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005001	A	8/31/2020	8/31/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: TTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005009	P	3/18/2021	3/18/2021	Email Message	"Fischer, Iris" <iris.fischer@blakes.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	FW: Correspondence from Blakes/Anson Funds		
AAI00005010	A	3/18/2021	3/18/2021	Letter	Iris Fischer (Blakes)	Gary Kelly (Stockhouse Publishing Ltd) Stockhouse Feedback, Customer Service, Technical Support, Bullboards and General Inquiries		Chris DiMatteo/Kaley Pulfer, Blakes	Abusive Content about Anson Funds on Stockhouse		
AAI00005020	P	8/31/2020	8/31/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: TTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005025	P	1/20/2021	1/20/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Sunny Puri" <spuri@ansonfunds.com>"			Re: Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005030	P	8/31/2020	8/31/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005044	A	11/11/2020	11/11/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			MEMBER SUPPORT - Slanderous Posting in Breach of Stockhouse Policies *Time Sensitive*		
AAI00005045	P	10/7/2020	10/7/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: Removed Posts		
AAI00005046	A	10/7/2020		Portable Network Graphics (PNG)							
AAI00005050	A	9/12/2020	9/12/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005051	P	12/21/2020	12/21/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"			RE: Threatening Posts Removal Request		
AAI00005055	P	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Re: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005057	P	4/29/2021	4/29/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	Re: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00005058	P	8/18/2020	8/18/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		

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AAI00005077	P		8/31/2020	8/31/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005081	P		1/26/2021	1/26/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005085	P		8/18/2020	8/18/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			(Post ID 31409558) - MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005098	P		8/18/2020	8/18/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Re: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005100	P		12/15/2020	12/15/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"		"Dan Jennings" <dan.jennings@stockhouse.com>"	RE: Threatening Posts Removal Request		
AAI00005101	A		12/15/2020	9/30/2020	Web Post	RainbowRunner				RE:Is this the guy that attacked cannabis stocks in good years?		
AAI00005102	A		12/15/2020	10/29/2020	Web Post	gottahunch				RE:Looks like the Moez Kassam Report is back up guys		
AAI00005122	P		3/9/2021	3/9/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005126	P		12/7/2020	12/7/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"		"Dan Jennings" <dan.jennings@stockhouse.com>"	RE: Threatening Posts Removal Request		
AAI00005127	A		12/7/2020	9/30/2020	Web Post	RainbowRunner				RE:Is this the guy that attacked cannabis stocks in good years?		
AAI00005128	A		12/7/2020	10/29/2020	Web Post	gottahunch				RE:Looks like the Moez Kassam Report is back up guys		
AAI00005136	P		4/23/2021	4/23/2021	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	Re: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00005151	P		12/11/2020	12/11/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			RE: Threatening Posts Removal Request		
AAI00005152	A		12/11/2020	9/30/2020	Web Post	RainbowRunner				RE:Is this the guy that attacked cannabis stocks in good years?		
AAI00005153	A		12/11/2020	10/29/2020	Web Post	gottahunch				RE:Looks like the Moez Kassam Report is back up guys		
AAI00005157	P		4/20/2021	4/20/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Afik Rechler" <afik@marketacross.com>;"Moez Kassam" <mkassam@ansonfunds.com>"		"Zubin Gada (hi@zubingada.com)" <hi@zubingada.com>"	RE: Moez Kassam <> InboundJunction - ORM Proposal and a Plan of action		
AAI00005160	P		11/11/2020	11/11/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			MEMBER SUPPORT - Slanderous Posting in Breach of Stockhouse Policies *Time Sensitive*		
AAI00005168	P		3/8/2021	3/8/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005169	P		12/16/2020	12/16/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"			RE: Threatening Posts Removal Request		
AAI00005170	A		12/16/2020	9/30/2020	Web Post	RainbowRunner				RE:Is this the guy that attacked cannabis stocks in good years?		
AAI00005171	A		12/16/2020	10/29/2020	Web Post	gottahunch				RE:Looks like the Moez Kassam Report is back up guys		
AAI00005174	P		4/20/2021	4/20/2021	Email Message	"Afik Rechler" <afik@marketacross.com>"	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"		"Zubin Gada (hi@zubingada.com)" <hi@zubingada.com>"	RE: Moez Kassam <> InboundJunction - ORM Proposal and a Plan of action		
AAI00005189	P		8/31/2020	8/31/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005194	P		8/19/2020	8/19/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: (Post ID 31409558) - MEMBER SUPPORT - Slanderous Posting *Time Sensitive*		
AAI00005196	P		4/20/2021	4/20/2021	Email Message	"Afik Rechler" <afik@marketacross.com>"	"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>"		"Zubin Gada (hi@zubingada.com)" <hi@zubingada.com>"	RE: Moez Kassam <> InboundJunction - ORM Proposal and a Plan of action		
AAI00005221	P		6/14/2021	6/14/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>;"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00005224	P		3/11/2021	3/11/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005226	P		3/12/2021	3/12/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005235	P		12/8/2020	12/8/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			FW: Threatening Posts Removal Request		
AAI00005238	P		1/12/2021	1/12/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		

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AAI00005244	P	3/15/2021	3/15/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005254	P	3/24/2021	3/24/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005261	P	9/28/2020	9/28/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00005270	P	12/16/2020	12/16/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"support@stockhouse.com" <support@stockhouse.com>"			RE: Threatening Posts Removal Request		
AAI00005271	A	12/16/2020		Portable Network Graphics (PNG)							
AAI00005272	A	12/16/2020		Portable Network Graphics (PNG)							
AAI00005295	P	6/11/2021	6/11/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>,"Wong, Winnie" <winnie.wong@blakes.com>"		"Gary Kelly" <gary.kelly@stockhouse.com>,"Laura Salvatori" <lsalvatori@ansonfunds.com>,"Fischer, Iris" <iris.fischer@blakes.com>,"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>,"Pulfer, Kaley" <kaley.pulfer@blakes.com>"	RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		
AAI00005297	P	3/8/2021	3/8/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005299	P	12/21/2020	12/21/2020	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005305	P	1/22/2021	1/22/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005315	P	8/19/2020	8/19/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Re: (Post ID 31409654) - MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00005333	P	10/5/2020	10/5/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Removed Posts		
AAI00005341	P	8/18/2020	8/18/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Re: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00005369	P	8/31/2020	8/31/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00005371	A	8/15/2022	8/15/2022	Web post	u/Bleakerde				The Crooked Partnership Between Hindenburg And Anson Funds. (Recent Target- Facedrive)		
AAI00005372	A	8/15/2022	8/15/2022	Web post	u/stewartoregon				Aleafia victim of a short attack by Anson Funds?		
AAI00005374	A	8/15/2022	8/15/2022	Web post	u/Rubarbarbara				A long list of Anson short positions. Good post on Stockhouse here		
AAI00005375	A	8/15/2022	8/15/2022	Web post	u/sugershark				Moez Kassam & Anson Funds Part II: Rotten To The Core		
AAI00005376	A	8/15/2022	8/15/2022	Web post	u/Rubarbarbara				A detailed report on the Anson criminals and how they operate		
AAI00005381	P	4/20/2021	4/20/2021	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Afik Rechler" <afik@marketacross.com>,"Sunny Puri" <spuri@ansonfunds.com>"		"Zubin Gada (hi@zubingada.com)" <hi@zubingada.com>"	RE: Moez Kassam <> InboundJunction - ORM Proposal and a Plan of action		
AAI00005382	P	6/11/2021	6/11/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Afik Rechler" <afik@marketacross.com>,"Moez Kassam" <mkassam@ansonfunds.com>"		"Zubin Gada (hi@zubingada.com)" <hi@zubingada.com>"	RE: Moez Kassam <> InboundJunction - ORM Proposal and a Plan of action		
AAI00005383	P	8/30/2020	8/30/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			TTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00005405	P	10/6/2020	10/6/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: Removed Posts		
AAI00005415	P	3/8/2021	3/8/2021	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: ATTN: MEMBER SUPPORT - Libelous Posting *Time Sensitive*		
AAI00005418	P	2/1/2021	2/1/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"bullboards@stockhouse.com" <bullboards@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005419	A	2/1/2021		Portable Network Graphics (PNG)							
AAI00005420	A	2/1/2021		Portable Network Graphics (PNG)							
AAI00005434	P	9/14/2020	9/14/2020	Email Message	"Stockhouse Member Support" <support@stockhouse.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			Re: RE: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00005441	P	1/21/2021	1/21/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005465	P	2/5/2021	2/5/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005482	P	3/16/2021	3/16/2021	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: Urgent Request Removing Threatening Material that Degrades Stockhouse.com		
AAI00005494	P	9/14/2020	9/14/2020	Email Message	"Laura Salvatori" <lsalvatori@ansonfunds.com>"	"Stockhouse Member Support" <support@stockhouse.com>"			RE: RE: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*		
AAI00005505	P	7/8/2019	7/8/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Mark Rendell" <MRendell@globeandmail.com>"		"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"	intro		
AAI00005506	P	8/24/2018	8/24/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"			Re: Intro		
AAI00005507	P	10/15/2018	10/15/2018	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"			RE: Apollo and Canopy		
AAI00005508	P	8/26/2018	8/26/2018	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"			Re: TGOD		

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AAI00005509	P		8/26/2018	8/26/2018	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Sunny Puri" <spuri@ansonfunds.com>;"Michele Benjamin" <mbenjamin@ansonfunds.com>"	Re: Intro		
AAI00005510	P		8/24/2018	8/24/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"		Re: Intro		
AAI00005511	P		8/27/2018	8/27/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"		Re: TGOD		
AAI00005512	P		7/8/2019	7/8/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"		from prospectus		
AAI00005513	A		7/8/2019	7/8/2019	Embedded Excerpt of Document				Regulatory Risks		
AAI00005514	P		7/16/2019	7/16/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"		interesting		
AAI00005515	P		7/23/2019	7/23/2019	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"		Invoice		
AAI00005516	A		7/23/2019	7/24/2019	Invoice	Robert Doxtator, Harvest Moon	Moez Kassam		Invoice # 5		
AAI00005517	P		7/25/2019	7/25/2019	Email Message	"Katy Hackett" <khackett@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"	"Tony Moore" <tmoore@ansonfunds.com>;"Scott Arbuckle" <sarbuckle@ansonfunds.com>"	RE: Updated Invoice		
AAI00005518	P		7/11/2019	7/11/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"		Fwd: TRST-TSX Reassessing our view; downgrading to HOLD from Spec Buy; target to C\$5.00 from C\$12.00		
AAI00005519	P		7/25/2019	7/25/2019	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Katy Hackett" <khackett@ansonfunds.com>"		Re: Updated Invoice		
AAI00005520	P		10/15/2018	10/15/2018	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Robert Doxtator" <harvestmooncannabisco@gmail.com>"		RE: Apollo and Canopy		
AAI00005521	P		10/29/2018	10/29/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"	"David J. DesLauriers" <djdl@dleinvestments.ca>;"Michael J. DesLauriers" <mjdl@dleinvestments.ca>"	Re: intro		
AAI00005522	P		10/29/2018	10/29/2018	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"David J. DesLauriers" <djdl@dleinvestments.ca>;"Michael J. DesLauriers" <mjdl@dleinvestments.ca>"	"HarvestMoonCannabisCo@gmail.com" <HarvestMoonCannabisCo@gmail.com>"	intro		
AAI00005523	P		9/20/2018	9/20/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"spuri@ansonfunds.com" <spuri@ansonfunds.com>"		Fwd: germany		
AAI00005524	A		9/20/2018	9/14/2018	Report	Cronos Group Inc.			HARVEST MOON DUE DILIGENCE Report – Cronos group INC.		
AAI00005525	P		7/9/2019	7/9/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"		Fwd: CannTrust - Downgrade to Mkt(S); Health Canada Identifies Licensing Issues (Comment)		
AAI00005526	P		10/15/2018	10/15/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Sunny Puri" <spuri@ansonfunds.com>"		Re: Apollo and Canopy		
AAI00005527	P		8/16/2019	8/16/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"		Fwd: Bronte Capital		
AAI00005528	P		9/5/2018	9/5/2018	Email Message		"Michael Miller" <mmiller@whitesheepcorp.com>;"Robert Doxtator" <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"	Re: Feedback on Beleave		
AAI00005529	P		7/9/2019	7/9/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"		Fwd: TRST CN - A tough path forward; downgrade to Sector Perform		
AAI00005530	P		8/26/2018	8/26/2018	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"		Re: Intro		
AAI00005531	P		7/17/2019	7/17/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"	"spuri@ansonfunds.com" <spuri@ansonfunds.com>"	Trst doc		
AAI00005532	A		7/17/2019		Logo						
AAI00005533	A		7/17/2019	7/9/2019	Memo	Craig Wiggins			CannTrust - CSI'ing The Blast Crater		
AAI00005534	P		7/23/2019	7/23/2019	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"		Updated Invoice		
AAI00005535	A		7/23/2019	7/24/2019	Invoice	Robert Doxtator, Harvest Moon	Moez Kassam		Invoice # 5		
AAI00005536	P		8/26/2018	8/26/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"		Re: Intro		
AAI00005537	P		10/15/2018	10/15/2018	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Robert Doxtator" <harvestmooncannabisco@gmail.com>"		Apollo and Canopy		
AAI00005538	A		10/15/2018	10/14/2018	Summary	Ronnie			Apollo Applied Research and Apollo CRO inc., are both owned by Canopy		
AAI00005539	P		7/31/2019	7/31/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"		FW: Hexo		
AAI00005540	A		7/31/2019	7/31/2019	Summary	Ronnie Liu			Hexo Earnings		
AAI00005541	A		7/31/2019	7/31/2019	Spreadsheet	Ronnie Liu			Hexo Inventory Numbers		
AAI00005542	P		10/5/2018	10/5/2018	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Robert Doxtator" <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"	Potential Consultant Terms		
AAI00005543	P		8/25/2018	8/25/2018	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"		Re: Intro		
AAI00005544	P		8/23/2018	8/23/2018	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"HarvestMoonCannabisCo@gmail.com" <HarvestMoonCannabisCo@gmail.com>"	"allenspektor@gmail.com" <allenspektor@gmail.com>"	RE: Intro		
AAI00005545	P		7/10/2019	7/10/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"		FW: CannTrust deal		
AAI00005546	P		8/26/2018	8/26/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"mkassam@ansonfunds.com" <mkassam@ansonfunds.com>"		TGOD		
AAI00005547	A		8/26/2018	6/26/2018	Brief	Michael Miller			The Green Organic Dutchman Disclosure Violations Matter		
AAI00005548	P		10/1/2020	10/1/2020	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"		Invoice		

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AAI00005549	A	10/1/2020	10/1/2020	Invoice	Robert Doxtator, Harvest Moon				Invoice # 47		
AAI00005550	P	7/9/2019	7/9/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"			(CNP) CannTrust warns of shortages after regulator flags greenhouse for non-compliance		
AAI00005551	P	8/23/2018	8/23/2018	Email Message	"Allen Spektor" <allenspektor@gmail.com>"	"HarvestMoonCannabisCo@gmail.com" <HarvestMoonCannabisCo@gmail.com>," Moez Kassam" <mkassam@ansonfunds.com>"			Intro		
AAI00005552	P	8/27/2018	8/27/2018	Calendar Meeting Appointment	"Moez Kassam" <mkassam@ansonfunds.com>"	"HarvestMoonCannabisCo@gmail.com" <HarvestMoonCannabisCo@gmail.com>"			Meeting with Robert Doxtator of Harvest Moon Cannabis		
AAI00005553	P	7/29/2019	7/29/2019	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Katy Hackett" <khackett@ansonfunds.com>"			Re: Updated Invoice		
AAI00005554	P	7/25/2019	7/25/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"			FW: When does that wire go out ? The 30k cdn		
AAI00005555	P	7/23/2019	7/23/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"			RE: TRST trade file		
AAI00005556	A	7/23/2019	7/23/2019	Spreadsheet	Daniel Kim						
AAI00005557	P	7/10/2019	7/10/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"			FW: CannTrust - Uncertainty Ahead		
AAI00005558	P	7/24/2019	7/24/2019	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"harvestmooncannabisco@gmail.com" <harvestmooncannabisco@gmail.com>"			FW: Mackie Research - The Daily Extract - July 24th, 2019		
AAI00005559	P	8/26/2018	8/26/2018	Email Message	"Harvest Moon Cannabis Co." <harvestmooncannabisco@gmail.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"			Re: Intro		
AAI00005560	P	4/15/2021	4/15/2021	Email Message	"theheavensabove" <theheavensabove@protonmail.com>"	"mkassam@ansonfunds.com" <mkassam@ansonfunds.com>"			See Attachments		
AAI00005561	A	4/15/2021	8/21/2020	Draft Web Post	Howling Mad Murdock				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure - Part 1		
AAI00005562	A	4/15/2021	8/21/2020	Transcript of call	Josh Owens				1st Call – setting the stage but has some useful information		
AAI00005563	A	4/15/2021	8/21/2020	Transcript of call	Josh Owens				3rd Call – Lots of info		
AAI00005564	A	4/15/2021	8/21/2020	Transcript of call	Josh Owens				4th Call – more info		
AAI00005565	A	4/15/2021	8/21/2020	Transcript of call	Josh Owens				2nd Call – Bit more info before the big call		
AAI00005566	P	5/12/2021	5/12/2021	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"theheavensabove" <theheavensabove@protonmail.com>"			RE: See Attachments		
AAI00005567	P	9/5/2018	9/5/2018	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"Michael Miller" <mmiller@whitesheepcorp.com>,"Robert Doxtator" <harvestmooncapitalco@gmail.com>"	"spuri@ansonfunds.com" <spuri@ansonfunds.com>"	"Moez Kassam" <mkassam@ansonfunds.com>"	Feedback on Beleave		
AAI00005568	P	9/11/2018	9/11/2018	Email Message	"Sunny Puri" <spuri@ansonfunds.com>"	"mmiller@whitesheepcorp.com" <mmiller@whitesheepcorp.com>"			MCA lawsuit		
AAI00005569	A	9/11/2018	3/20/2015	Affidavit	Rade Kovacevic				Affidavit of Rade Kovacevic (Sworn 20 March 2015)		
AAI00005570	P	9/7/2018	9/7/2018	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"mmiller@whitesheepcorp.com" <mmiller@whitesheepcorp.com>"			call		
AAI00005915	P	10/5/2020	10/5/2020	Email Message	"Luigi Calabrese" <lcalabrese@frontiernetworks.ca>"	"Moez Kassam - Anson Group (mkassam@ansonfunds.com)" <mkassam@ansonfunds.com>,"Sunny Puri" <spuri@ansonfunds.com>,"Laura Salvatori" <lsalvatori@ansonfunds.com>"			proton email	Yes	1. Privileged Information
AAI00006395	P	10/31/2020	10/31/2020	Email Message	"Luigi Calabrese" <lcalabrese@frontiernetworks.ca>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>,"Moez Kassam - Anson Group (mkassam@ansonfunds.com)" <mkassam@ansonfunds.com>,"Sunny Puri" <spuri@ansonfunds.com>"			Fwd: Our previous communication on Anson Funds report	Yes	1. Privileged Information
AAI00010153	P	11/18/2022	11/18/2022	Web Post	marketfrauds.to				Anson Funds Desperate For \$350 Million Amid DOJ Investigation - Market Frauds		
AAI00010036	P	2/10/2021	2/10/2021	Web Post	marketfrauds.to				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Market frauds		
AAI00010037	P	2/10/2021	2/10/2021	Web Page	marketfrauds.to				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Market frauds		
AAI00010038	P	5/15/2021	5/15/2021	Web Post	marketfrauds.to				Moez Kassam has moved over \$20 million into offshore accounts in UAE and Dubai – Market frauds		
AAI00010039	P	3/8/2021	3/8/2021	Archive Record	whois.domaintools.com				MarketFrauds.to WHOIS, DNS, & Domain Info - DomainTools		
AAI00010040	P	5/15/2021	5/15/2021	Web Post	marketfrauds.to				Moez Kassam has moved over \$20 million into offshore accounts in UAE and Dubai – Market frauds		
AAI00010041	P	5/17/2021	5/17/2021	Archive Record	whois.domaintools.com				MarketFrauds.to WHOIS, DNS, & Domain Info - DomainTools		
AAI00010042	P	5/15/2021	5/15/2021	Web Post	marketfrauds.to				Moez Kassam has moved over \$20 million into offshore accounts in UAE and Dubai – Market frauds		
AAI00010043	P	2/10/2021	2/10/2021	Web Post	marketfrauds.to				Moez Kassam and Anson Funds , A Tale of Corruption, Greed, and Failure – Market frauds		
AAI00010044	P	10/3/2020	10/3/2020	Web Post	Saved by Blink	www.capitalmarketcrimes.org			Market Investigations – Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		

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AAI00010045	P	10/4/2020	10/4/2020	Web Page	www.stockmanipulators.com				Stockmanipulators.org Landing Page.pdf		
AAI00010046	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010047	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010048	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010049	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010050	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010051	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010052	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010053	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010054	P	10/3/2020	10/3/2020	Archive Record	whois.domaintools.com				StockManipulators.org WHOIS, DNS, & Domain Info - DomainTools		
AAI00010055	P	10/3/2020	10/3/2020	Archive Record	whois.domaintools.com				StockManipulators.org WHOIS, DNS, & Domain Info - DomainTools		
AAI00010056	P	10/3/2020	10/3/2020	Web Page	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010057	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010058	P	10/3/2020	10/3/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010059	P	10/3/2020	10/3/2020	Web Page	capitalmarketcrimes.to				Capitalmarketcrimes.org Landing Page		
AAI00010060	P	6/28/2021	6/28/2021	Web Post	marketfrauds.to				Moez Kassam & Anson Funds Part II: Rotten To The Core – Market frauds		
AAI00010061	P	6/28/2021	6/28/2021	Web Post	marketfrauds.to				Moez Kassam & Anson Funds Part II: Rotten To The Core – Market frauds		
AAI00010062	P	6/28/2021	6/28/2021	Web Post	marketfrauds.to				Moez Kassam & Anson Funds Part II: Rotten To The Core – Market Frauds		
AAI00010086	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010087	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010088	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010089	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010090	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010091	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010092	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure		
AAI00010093	P	10/6/2020	10/6/2020	Web Posts	stockmanipulators.org				Market Investigations – Moez Kassam and Anson Funds_ A Tale of Corruption, Greed, and Failure		
AAI00010094	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Market Investigations		
AAI00010095	P	10/6/2020	10/6/2020	Web Post	stockmanipulators.org				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Market Investigations		
AAI00010112	P	9/28/2020	9/28/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>"	"R Lantos" <robert@lantos.ca>"			Re:		
AAI00010113	P	10/5/2020	10/5/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>"	"David Cusson" <dcusson@echelonpartners.com>"			RE: Anson response to anonymous attack		
AAI00010115	P	9/28/2020	9/28/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>"	"Rendell, Mark" <MRendell@globeandmail.com>"			RE: Mark: Have you seen this developing scandal in Canada and the U.S.? Fraud, corruption and Moez Kassam of Anson Funds		
AAI00010118	P	9/29/2020	9/29/2020	Email Message	"Moez Kassam" <mkassam@ansonfunds.com>"	"Mikhail Kassam" <mik@kassam.co>"			Re: Moez Kassam and Anson Funds_ A Tale of Corruption, Greed, and Failure – Capital Market Crimes.pdf		

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AAI00010120	P	9/29/2020	9/29/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>"	"Teri Buhl" <teribuhl@gmail.com>"			RE: Re:		
AAI00010124	P	9/30/2020	9/30/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>	"Adam Spears (adam@ace148.com)" <adam@ace148.com>			question		
AAI00010128	P	9/28/2020	9/28/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>	"Bruce Stubbs" <brucestubbs@hotmail.com>			RE: Barrons: Robinhood Turned Millions of People Stuck at Home Into Investors. What's Next for the App?		
AAI00010130	P	9/29/2020	9/29/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>	"Ben Mogil" <ben.mogil@gmail.com>			Re:		
AAI00010135	P	10/8/2020	10/8/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>"	"Vincent Cosentino" <vcosentino@johnvince.com>"			RE: Update		
AAI00010136	P	9/30/2020	9/30/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>	"Ebrahim El Kalza (eelkalza@gmail.com)" <eelkalza@gmail.com>			FW: response		
AAI00010139	P	9/28/2020	9/28/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>"			FW: Mark: Have you seen this developing scandal in Canada and the U.S.? Fraud, corruption and Moez Kassam of Anson Funds	Yes	1. Privileged Information
AAI00010145	P	9/29/2020	9/29/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>	"Teri Buhl" <teribuhl@gmail.com>			RE: Re:		
AAI00010146	P	9/29/2020	9/29/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>"	"Jansen, Kimberley" <Kimberley.Jansen@bmo.com>"			RE: Follow Up		
AAI00010147	P	9/29/2020	9/29/2020	Email Message	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D D129-MKASSAM>"	"Kimberley Jansen (Kimberley.jansen@bmo.com)" <Kimberley.Jansen@bmo.com>"			Follow Up		
AAI00010148	A	9/29/2020	9/28/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes		
AAI00010157	P	11/25/2022	11/25/2022	Twitter Thread	Betting Bruiser				guid:juCPYWWvHxBxB4avxC8qj		
AAI00010159	P	11/26/2020	11/26/2020	Web Post	marketcrimes.to				Moez Kassam and Anson Funds; A Tale of Corruption, Greed, and Failure - Wayback Machine (November 26, 2020)		
AAI00010160	P	5/18/2021	5/18/2021	Web Post	Drew				Claritas Investors - The Wrath Of Short Sellers. An Expose On Anson Funds. (Latest Victim- Facedrive)		
AAI00010161	P	8/17/2021	8/17/2021	Web Post	marketfrauds.to				Anson Funds Active Cyber Crime		
AAI00010162	P	9/28/2020	9/28/2020	Web Post	ripoffreport.com				Ripoff Report - First Defamatory Manifesto - Moez Kassam Review - Toronto		
AAI00010163	P	6/28/2021	6/28/2021	Web Post	marketfrauds.to				Moez Kassam and Anson Funds Part II; Rotten to the Core (June 28, 2021)		
AAI00010164	P	12/15/2021	12/15/2021	Web Post	marketfrauds.to				DoJ Targets Anson Funds for Illegal Short-Selling, Fraud and Insider Trading		
AAI00010165	P	11/7/2022	11/7/2022	Web Post	moezkassam.com				Defamatory Manifesto - Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure - Capital Market Crimes		

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AAI00010166	P	9/25/2020	9/25/2020	Web Post	www.stockmanipulators.com				Stock Manipulators - Moez Kassam and Anson Funds; A Tale of Corruption, Greed, and Failure (September 25, 2020)		
AAI00010167	P	11/25/2022	11/25/2022	Web Post	ripoffreport.com				Ripoff Report - How can i obtain information about an author who i believe has defamed me?		
AAI00010168	P	12/17/2021	12/17/2021	Web Post	marketfrauds.to				Lawsuits against Anson Funds - Market Frauds		
AAI00010169	P	9/25/2020	9/25/2020	Web Post	moezkassam.com				Moez Kassam and Anson Funds; A Tale of Corruption, Greed, and Failure (September 25, 2020)		
AAI00010170	P	2/10/2021	2/10/2021	Web Post	marketfrauds.to				Moez Kassam and Anson Funds; A Tale of Corruption, Greed, and Failure (February 10, 2021)		
AAI00010171	P	12/23/2021	12/23/2021	Web Post	marketfrauds.to				Plan by Moez Kassam for Anson Funds Unitholders - It Is Not Good		
AAI00010172	P	9/29/2020	9/29/2020	Web Post	EnergyEnthusiast				Reddit - Is naked shorting illegal in Canada and is it public information if someone is naked short		
AAI00010173	P	1/18/2022	1/18/2022	Web Post	marketfrauds.to				Augenbaum v. Anson Investments Master Fund LP et al - Market Frauds		
AAI00010174	P	9/27/2020	9/27/2020	Web Post	aleafia				Reddit - Moez Kassam and Anson Funds; A Tale of Corruption, Greed, and Failure - (post deleted)		
AAI00010175	P	1/19/2022	1/19/2022	Web Post	marketfrauds.to				GENIUS Brands - The Story Anson Funds Doesn't Want You To Read		
AAI00010176	P	9/28/2020	9/28/2020	Web Post with comments	IvanSkavar				Reddit - Moez Kassam and Anson Funds; A Tale of Corruption, Greed, and Failure		
AAI00010177	P	3/8/2022	3/8/2022	Web Post	marketfrauds.to				Moez Kassam & Anson Funds: Panic as DOJ Widens Investigation		
AAI00010178	P	10/6/2020	10/6/2020	Web Post with comments	offcoloroncolor				Reddit - Moez Kassam and Anson Funds; A Tale of Corruption, Greed, and Failure - (October 6, 2020)		
AAI00010179	P	5/17/2022	5/17/2022	Web Post	marketfrauds.to				Anatomy of an Anson Funds Short & Distort Attack moez kassam		
AAI00010180	P	9/28/2020	9/28/2020	Web Post with comments	ResignedFate				Reddit - Moez Kassam and Anson Funds; A Tale of Corruption, Greed, and Failure		
AAI00010181	P	11/1/2022	11/1/2022	Web Post	marketfrauds.to				New Lawsuit Against Anson Funds – Sentia Wellness - Market Frauds		
AAI00010182	P	4/6/2021	4/6/2021	Web Post	SadMud7428				Reddit - The Wrath Of Short Sellers. An Expose On Anson Funds. (Latest Victim-Facedrive)		
AAI00010183	P	11/17/2022	11/17/2022	Web Post	marketfrauds.to				Anson Funds Desperate For \$350 Million Amid DOJ Investigation - Market Frauds		
AAI00010184	P	10/30/2020	10/30/2020	Web Post with comments	ControlPlusZ				Reddit - Was SHRM the Victim of a Shady Hedge Fund		
AAI00010185	P	3/16/2021	3/16/2021	Web Post	BurneByAnsonFunds				Reddit - A long list of Anson short positions (re Stockhouse Post #32808934)		
AAI00010186	P	11/24/2022	11/24/2022	Web Post	BurneByAnsonFunds				Reddit - Anson Funds Day of Despair; 2 monitors broken and everyone sent home (full post via Wayback Machine)		
AAI00010187	P	3/19/2021	3/19/2021	Web Post	stewartoregon				Reddit - Is there a correlation between negative articles in the Globe and Mail and Anson Fund's short positions (re Stockhouse Post #32837143)		
AAI00010188	P	11/24/2022	11/24/2022	Web Post	SOSStock				[ADDED] Reddit - The HY and FXK websites are scare tactics used by hedge founds		
AAI00010189	P	10/1/2020	10/1/2020	Web Post	Dai Truong				Substack - Cannabis M&A to accelerate - by Dai Truong		
AAI00010190	P	5/31/2021	5/31/2021	Web Post	wembley				Stockhouse.com - (Sharing Link to BurnedByAnsonFunds) And so it begins. (May 31 2021)		
AAI00010191	P	3/19/2021	3/19/2021	Web Post	wembley				Stockhouse.com - (Sharing Link to BurnedByAnsonFunds) Anson is short big Medv ! Fact (Mar. 19 2021)		
AAI00010192	P	11/21/2022	11/21/2022	Web Post	Market Frauds				Hurt by Anson Funds – the SEC wants to hear from you ASAP - Market Frauds		
AAI00010193	P	8/18/2020	8/18/2020	Web Post					Stockhouse.com - August 17 Stockhouse Post - RE The Real Story on what happened with Moez Kassam and Aphria(Aug. 18 2020)		
AAI00010194	P	11/21/2022	11/21/2022	Web Post	marketfrauds.to				Corruption at Globe and mail – Mail sent to their staff and regulators		
AAI00010195	P	5/12/2021	5/12/2021	Web Post	wembley				Stockhouse.com - Medivolve - BIG problems at Anson Funds		
AAI00010196	P	11/21/2022	11/21/2022	Web Post	yegendorfd				Moez Kassam has moved over \$20 million into offshore accounts in UAE and Dubai - Market Frauds		
AAI00010197	P	10/1/2020	10/1/2020	Web Post	DavidM				Stockhouse.com - Canadian hedge fund under fire for illegal practices		

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AAI00010198	P	5/19/2021	5/19/2021	Web Post	yegendorfd				Moez Kassam has moved over \$20 million into offshore accounts in UAE and Dubai - Market Frauds		
AAI00010199	P	6/28/2021	6/28/2021	Web Post	wembley				Stockhouse.com - Fry Moez Fry !!!		
AAI00010200	P	5/23/2021	5/23/2021	Web Post	marketfrauds.to				Reconnaissance Energy Africa is Anson Funds next target - Illegal tactics being employed by Anson		
AAI00010201	P	9/28/2020	9/28/2020	Web Post	Imelda				Stockhouse.com - Have you guys seen this (Sept. 28 2020)		
AAI00010202	P	5/31/2021	5/31/2021	Web Post	marketfrauds.to				Anson Funds short and distort campaign ...obe & Mail corruption) - Market Frauds		
AAI00010203	P	9/29/2020	9/29/2020	Web Post	AlbertoN				Stockhouse.com - Have you seen the huge financial scandal that's unfolding		
AAI00010204	P	5/14/2021	5/14/2021	Web Post	wembley				Stockhouse.com - No sign of Knowsbest		
AAI00010205	P	9/27/2020	9/27/2020	Web Post	cool888				Stockhouse.com - Nothing to do with \$AAN... thought of passing it around		
AAI00010206	P	9/27/2020	9/27/2020	Web Post	cool888				Stockhouse.com - Nothing to do with \$ABX... thought of passing it around		
AAI00010207	P	9/27/2020	9/27/2020	Web Post	cool888				Stockhouse.com - Nothing to do with \$ABX... thought of passing it around		
AAI00010208	P	9/27/2020	9/27/2020	Web Post	cool888				Stockhouse.com - Nothing to do with \$ACB... thought of passing it around		
AAI00010209	P	9/27/2020	9/27/2020	Web Page	cool888				Stockhouse.com - Nothing to do with \$ATI... thought of passing it around		
AAI00010210	P	9/27/2020	9/27/2020	Web Page	cool888				Stockhouse.com - Nothing to do with \$CIO... thought of passing it around (September 27, 2020).PNG		
AAI00010211	P	9/27/2020	9/27/2020	Web Page	cool888				Stockhouse.com - Nothing to do with \$EMO... thought of passing it around		
AAI00010212	P	9/27/2020	9/27/2020	Web Page	cool888				Stockhouse.com - Nothing to do with \$NXS... thought of passing it around (September 27, 2020).PNG		
AAI00010213	P	9/27/2020	9/27/2020	Web Post	cool888				Stockhouse.com - Nothing to do with \$RVV... thought of passing it around		
AAI00010214	P	9/27/2020	9/27/2020	Web Page	cool888				Stockhouse.com - Nothing to do with \$RVV... thought of passing it around - Am not an expert, just a small time shareholder....		
AAI00010215	P	9/27/2020	9/27/2020	Web Post	cool888				Stockhouse.com - Nothing to do with \$TUSK... thought of passing it around		
AAI00010216	P	9/27/2020	9/27/2020	Web Post	cool888				Stockhouse.com - Nothing to do with \$WEED.. thought of passing it around - cool888 (September 27, 2020)		
AAI00010217	P	9/27/2020	9/27/2020	Web Post	cool888				Stockhouse.com - Nothing to do with \$WEED... thought of passing it around		
AAI00010218	P	9/28/2020	9/28/2020	Web Post	Toweringmars				Stockhouse.com - RE_RE_Time's Up (Sept. 28, 2020)		
AAI00010219	P	9/25/2020	9/25/2020	Web Post	moezkassam.com				Stockhouse.com - T.ZENA Stock Message Board & Forum (September 27, 2020)		
AAI00010798	P	10/13/2022	10/13/2022	Email	Markets-editor@protonmail.com				Our previous communication on Anson Funds report		
AAI00010799	P	10/13/2022	10/13/2022	Email	Markets-editor@protonmail.com				Our previous communication on Anson Funds report		
AAI00010800	P	10/5/2022	10/5/2022	Email	RS <birchstreet@gmail.com>	capitalmarketsinvestigation			Your mail to us on the Moez Kassam and Anson Funds Report		
AAI00010801	P	12/11/2022	12/11/2022	Web capture					How Anson Funds Used Seeking Alpha to Crush Companies - Market Frauds		
AAI00010223		1/19/2019	1/19/2019	Whatsapp Message	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]					
AAI00010229		7/25/2019	7/25/2019	Whatsapp Message	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]					
AAI00010238		10/9/2020	10/9/2020	Whatsapp Message	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net];System Message <System Message>					
AAI00010239		10/9/2020	10/9/2020	Generic MP4 container	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net];System Message <System Message>					
AAI00010240		10/9/2020	10/9/2020	Whatsapp Message	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net];System Message <System Message>					

[illegible]

SCHEDULE A

[illegible]

SCHEDULE B

Doc ID	Parent/Attachment	Parent Date	Doc Date	File Type	Title	Author	Recipient	CC	Privilege Type
AAI00000006	P	10/19/2020	10/19/2020	Internal work product	Bruiser, Doxtator Background	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000009	P	10/3/2020	10/3/2020	Internal work product	Website info	Laura Salvatori			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000010	P	10/1/2020	10/1/2020	Email Message	FW: OilPrice	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00000011	A	10/1/2020	10/1/2020	Picture	Untitled				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000015	P	10/9/2020	10/9/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000016	P	10/21/2020	10/21/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000025	P	10/19/2020	10/19/2020	Memorandum	Attribution Investigation – Preliminary Findings	K2 Intelligence, LLC	David Danovitch, Sullivan & Worcester LLP		02. Litigation Privileged
AAI00000026	P	11/5/2020	11/5/2020	Email Message	FW: Our previous communication on Anson Funds report	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000050	P	10/13/2020	10/13/2020	Internal anaysis	Twitter Master	Untitled			02. Litigation Privileged
AAI00000054	P	12/12/2020	12/11/2020	Memorandum	Interview PP 11 December 2020				02. Litigation Privileged
AAI00000057	P	10/23/2020	10/23/2020	Memorandum	Key Suspects: Connections Analysis	K2 Intelligence, LLC	David Danovitch, Sullivan & Worcester LLP		02. Litigation Privileged
AAI00000060	P	1/6/2021	1/6/2021	Report	Project Blank Glass Preliminary Analysis	Navin Reddy			02. Litigation Privileged
AAI00000062	P	12/18/2020	12/18/2020	Report	Project Silver Winter - Bosnia Report	Navin Reddy			02. Litigation Privileged
AAI00000068	P	1/22/2021	1/22/2021	Internal work product	In response to the Statement of defence	Jolene - ArcticWind			02. Litigation Privileged
AAI00000079	P	12/15/2020	12/15/2020	Internal work product	A Pattern of Behaviour	Jolene - ArcticWind			02. Litigation Privileged
AAI00000098	P	12/17/2020	12/17/2020	Report	Forensic Examination Report	Magnet Forensics			02. Litigation Privileged
AAI00000100	P	10/12/2020	10/12/2020	Email Message	FW: Jacob Doxtator	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	02. Litigation Privileged
AAI00000101	A	10/12/2020	10/12/2020	Screen capture	Jacob Doxtator				02. Litigation Privileged
AAI00000102	A	10/12/2020	10/12/2020	Screen capture	Jacob Doxtator				02. Litigation Privileged
AAI00000103	A	10/12/2020	10/12/2020	Screen capture	Untitled				02. Litigation Privileged
AAI00000104	A	10/12/2020	10/12/2020	Picture	Untitled				02. Litigation Privileged
AAI00000105	P	8/30/2020	8/30/2020	Email Message	RE: Privileged and Confidential - Message Board Postings / Other Correspondence	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00000106	A	8/30/2020	8/30/2020	Web Page with Comments	APHA 4.6900 0.1200 2.63% _ Aphria Inc. - Yahoo Finance				02. Litigation Privileged
AAI00000112	P	12/17/2020	12/17/2020	Internal work product	Journalist.xlsx MetaData = James Stafford	Mark Watson			02. Litigation Privileged
AAI00000115	P	10/30/2020	10/30/2020	Email Message	Marketcrimes.to	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00000116	A	10/30/2020	10/30/2020	Screen capture	Untitled				02. Litigation Privileged
AAI00000117	A	10/30/2020	10/30/2020	Screen capture	Index of /wp-content/uploads/2020/0				02. Litigation Privileged
AAI00000133	P	1/1/1900	1/1/1900	Internal analysis	Network Analysis				02. Litigation Privileged
AAI00000135	P	11/5/2020	11/5/2020	Report	Project Silver Winter - Interim Report	Navin Reddy			02. Litigation Privileged
AAI00000139	P	10/28/2020	10/28/2020	Report	Project Silver Winter - Interim Report	Navin Reddy			02. Litigation Privileged
AAI00000140	P	10/14/2020	10/14/2020	Email Message	Project Silver Winter Discussion points - 14 Oct 20	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	02. Litigation Privileged
AAI00000141	A	10/14/2020	10/14/2020	Internal analysis	Twitter Timeline analysis				02. Litigation Privileged
AAI00000142	A	10/14/2020	10/13/2020	Internal analysis	Twitter Master				02. Litigation Privileged
AAI00000144	P	1/20/2021	1/20/2021	Report	Project Silver Winter - James Stafford	Navin Reddy			02. Litigation Privileged
AAI00000145	P	10/10/2020	10/10/2020	Email Message	Quick Interim update & some further questions	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	02. Litigation Privileged
AAI00000146	A	10/10/2020	10/10/2020	Tweet	Untitled	Betting Bruiser			02. Litigation Privileged
AAI00000149	P	10/12/2020	10/12/2020	Email Message	RE: Findings and Next Steps	"Sunny Puri" <spuri@ansonfunds.com>	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Moez Kassam" <mkassam@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	02. Litigation Privileged
AAI00000150	A	9/25/2020	9/25/2020	Tweet	Untitled	Paul @PresumablyPaul	'@PresumablyPaul		02. Litigation Privileged
AAI00000151	A	9/14/2020	9/14/2020	Tweet	Untitled	Summer Houston			02. Litigation Privileged
AAI00000152	A	9/25/2020	9/25/2020	Tweet	Untitled	Paul @Presumably Paul	LamboJohnny; JohnMur67039142		02. Litigation Privileged
AAI00000153	A	1/1/1900	1/1/1900	Statement	Who are we?	Upside Makers			02. Litigation Privileged
AAI00000154	A	8/18/2020	8/18/2020	Tweet	Untitled	Paul	Paul, JohnMur67039142 and 7 others		02. Litigation Privileged
AAI00000155	A	10/10/2020	10/10/2020	Tweet	Untitled	Paul			02. Litigation Privileged
AAI00000157	P	10/14/2020	10/14/2020	Internal analysis	Twitter Timeline analysis				02. Litigation Privileged

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AAI00000160	P	12/22/2020	12/22/2020	Email Message	Update on Harris for records	"Sunny Puri" <spuri@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000272	P	3/8/2021	3/8/2021	Email Message	RE: Aphria Inc. T.APHA Stock Message Board & Forum Stockhouse	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000273	A	3/7/2021	3/7/2021	Web Post	Anson Funds under SEC Investigation - Do Unitholders know?	GordonGatsby			02. Litigation Privileged
AAI00000281	P	3/18/2021	3/18/2021	Internal work product	Stockhouse Links	Mark Baliwalla			02. Litigation Privileged
AAI00000282	P	4/23/2021	4/23/2021	Email Message	for records - reconnaissance energy africa ltd	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00000283	A	1/1/1900	1/1/1900	Web Post	Untitled				02. Litigation Privileged
AAI00000284	A	4/19/2021	4/19/2021	Web Article	The Best Is Yet To Come For The World's Hottest Oil Play	James Stafford			02. Litigation Privileged
AAI00000285	A	8/24/2020	8/24/2020	Web Article	The Biggest Oil Discovery Of the Year Could Happen Here	Sam Kennedy			02. Litigation Privileged
AAI00000286	A	4/20/2021	4/20/2021	Web Post	Anson Funds are the major short behind Reco's sell off	NemeCan			02. Litigation Privileged
AAI00000291	P	3/23/2021	3/23/2021	Internal work product	Betting Brusier Twitter Sources	Mark Baliwalla			02. Litigation Privileged
AAI00000378	P	4/26/2021	4/26/2021	Draft Court Document	Notice of Motion re Disclosure - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000379	P	6/7/2021	6/7/2021	Draft Court Document	Norwich - Supplementary Affidavit of Sunny Puri	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000382	P	6/1/2021	6/1/2021	Internal work product	Sunny Stockhouse Data Summary	Mark Baliwalla			02. Litigation Privileged
AAI00000383	P	6/2/2021	6/2/2021	Draft Court Document	CV-20-00653410-00CL - Motion Record	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000384	P	4/26/2021	4/26/2021	Internal work product	Stockhouse List Updates	Laura Salvatori			02. Litigation Privileged
AAI00000389	P	3/16/2021	3/16/2021	Draft Letter	Anson Letter to Stockhouse re New Posts	Iris Fischer (Blakes)	Stockhouse Publishing Ltd.		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000391	P	4/2/2021	4/2/2021	Internal work product	Sunny Stockhouse Data Summary	Mark Baliwalla			02. Litigation Privileged
AAI00000392	P	3/17/2021	3/17/2021	Draft Letter	Anson Letter to Stockhouse re New Posts (Anson Edits 3.17.21)	Iris Fischer (Blakes)	Stockhouse Publishing Ltd.		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000393	P	5/25/2021	5/25/2021	Draft Court Document	Affidavit of Sunny Puri	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000394	P	4/15/2021	4/15/2021	Draft Court Document	Notice of Application Form 14E	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000395	P	4/21/2021	4/21/2021	Draft Court Document	Notice of Motion re Disclosure	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000396	P	5/26/2021	5/26/2021	Draft Court Document	Affidavit of Sunny Puri - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000397	P	4/15/2021	4/15/2021	Draft Court Document	Notice of Application Form 14E	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000398	P	5/26/2021	5/26/2021	Draft Court Document	Norwich - Affidavit of Sunny Puri (Anson Comments 5.26.21)	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000399	P	5/26/2021	5/26/2021	Draft Court Document	Factum - Stockhouse Motion	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000400	P	4/16/2021	4/16/2021	Draft Court Document	Notice of Motion re Stockhouse - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000457	P	9/28/2020	9/28/2020	Email Message	RE: Statement for Globe/ Next Steps	"Moez Kassam" <mkassam@ansonfunds.com>"	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>"		02. Litigation Privileged
AAI00000458	P	4/15/2021	4/15/2021	Email Message	FW: See Attachments	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000459	A	4/15/2021	8/21/2020	Web Article	Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure - Part 1	James Stafford			01. Solicitor Client communication; 02. Litigation Privileged
AAI00000460	A	4/15/2021	8/21/2020	Transcript	1st Call – setting the stage but has some useful information				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000461	A	4/15/2021	8/21/2020	Transcript	3rd Call - Lots of info				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000462	A	4/15/2021	8/21/2020	Transcript	4th Call – more info				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000463	A	4/15/2021	8/21/2020	Transcript	2nd Call – Bit more info before the big call				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000472	P	3/17/2021	3/17/2021	Draft Letter	Abusive Content about Anson Funds on Stockhouse	Iris Fischer (Blakes)	Stockhouse Publishing Ltd.		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000473	P	11/10/2022	11/10/2022	Internal work product	Advanced Media Solutions and James Stafford Connection	Nitish Dang			02. Litigation Privileged
AAI00000495	P	3/6/2021	3/6/2021	Internal work product	Betting Brusier Twitter – Anson, MMCAP, Moez, and More	Mark Baliwalla			02. Litigation Privileged

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AAI00000498	P	3/24/2021	3/24/2021	Internal work product	Betting Brusier Twitter – Anson, MMCAP, Moez, and More	Mark Baliwalla			02. Litigation Privileged
AAI00000499	P	2/28/2021	2/28/2021	Internal work product	Betting bruiser – Anson, Moez (Screenshot and link) Dec Since 21	Mark Baliwalla			02. Litigation Privileged
AAI00000502	P	9/17/2021	9/17/2021	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged
AAI00000505	P	10/22/2020	10/22/2020	Spreadsheet	Spreadsheet support for invoice	Navin Reddy			02. Litigation Privileged
AAI00000507	P	10/28/2020	10/28/2020	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged
AAI00000510	P	11/4/2020	11/4/2020	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000516	P	11/12/2020	11/12/2020	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000517	P	11/19/2020	11/19/2020	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000519	P	11/25/2020	11/25/2020	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000521	P	12/17/2020	12/17/2020	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000525	P	1/4/2021	1/4/2021	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000530	P	1/26/2021	1/26/2021	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000535	P	3/2/2021	3/2/2021	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000537	P	3/29/2021	3/29/2021	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000540	P	5/4/2021	5/4/2021	Spreadsheet	Spreadsheet support for invoice	Artemis Risk Consulting Ltd			02. Litigation Privileged; 04. Redaction required
AAI00000564	P	3/31/2021	3/31/2021	Internal work product	Untitled				02. Litigation Privileged
AAI00000625	P	3/10/2021	3/10/2021	Screenshot	Social Media Monitoring & Twitter				02. Litigation Privileged
AAI00000628	P	3/12/2021	3/12/2021	Internal work product	Stockhouse				02. Litigation Privileged
AAI00000646	P	9/29/2020	9/29/2020	Email Message	RE: Google Alert - Moez Kassam	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000648	A	12/31/2020	12/17/2020	Internal work product	Journalist.xlsx MetaData = James Stafford	Mark Watson			02. Litigation Privileged
AAI00000654	A	7/1/2022	12/17/2020	Internal work product	Journalist.xlsx MetaData = James Stafford	Mark Watson			02. Litigation Privileged
AAI00000680	P	3/31/2021	3/31/2021	Email Message	FW: Presumable_Paul_Tweets_as_at_31_MAR_2021	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00000685	P	12/16/2020	12/16/2020	Email Message	RE: Anson - exhibits for motion and document matters	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Meryl Conant Governski" <MGovernski@willkie.com>;"Tariq Mundiya" <tmundiya@willkie.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00000728	P	12/16/2020	12/16/2020	Email Message	RE: Anson - Final Comments to SoC	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00000745	P	12/16/2020	12/16/2020	Email Message	RE: Anson - Update	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00000752	P	9/28/2020	9/28/2020	Email Message	RE: *TIME SENSITIVE* Domain Name De-Registration Request - Breach of 15 § U.S.C. 8131	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00000776	P	7/1/2022	7/1/2022	Email Message	RE: Follow up from your consult	"Daniel Powell" <DPowell@minclaw.com>	"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Aaron Minc" <Aminc@minclaw.com>;"Carlson, Andrew" <acarlson@dwpv.com>;"O'Sullivan, Maura" <mosullivan@dwpv.com>;"Melanie Hughes" <mhughes@minclaw.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Susan Jacobsen" <sjacobsen@minclaw.com>	01. Solicitor Client communication

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AAI00000777	A	7/1/2022	7/1/2022	Web capture	Whois History for Floatingmix.com				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000778	A	7/1/2022	7/1/2022	Web capture	Whois History for Floatingmix.com				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000780	A	7/1/2022	7/1/2022	Web capture	Whois History for Floatingmix.com				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000782	A	7/1/2022	7/1/2022	Web capture	Whois History for Floatingmix.com				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000783	A	7/1/2022	7/1/2022	Web capture	Whois Record for FloatingMix.com				01. Solicitor Client communication; 02. Litigation Privileged
AAI00000784	A	7/1/2022	7/1/2022	Web capture	Whois History for Floatingmix.com	Page Vault			01. Solicitor Client communication
AAI00001105	P	12/8/2020	12/8/2020	Email Message	FW: Anson - Update	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001106	A	12/8/2020	12/7/2020	Email Message	capitalmarketcrimes and marketcrimes - view count	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001109	A	12/8/2020	12/7/2020	Email Message	new tweets	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001110	A	12/8/2020	12/8/2020	Draft Court Document	Affidavit of S. Puri - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001111	A	12/8/2020	12/4/2020	Email Message	RE: Anson - Update	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001112	A	8/14/2020	8/14/2020	Tweet with Reply	Untitled	John Murphy			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001114	A	12/8/2020	12/8/2020	Tweet	Untitled				01. Solicitor Client communication; 02. Litigation Privileged
AAI00001115	A	12/8/2020	10/28/2020	Report	Project Silver Winter - Interim Report	Navin Reddy			02. Litigation Privileged
AAI00001116	A	12/8/2020	12/8/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001117	A	12/8/2020	12/4/2020	Email Message	RE: Anson - Update	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001125	P	11/24/2021	11/24/2021	Email Message	Project Silver Winter - Main Reports	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Milne-Smith, Matthew (MMilne-Smith@dwpv.com)" <mmilne-smith@dwpv.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001126	A	11/24/2021	1/20/2021	Report	Project Silver Winter - James Stafford	Navin Reddy			02. Litigation Privileged
AAI00001127	A	11/24/2021	12/18/2020	Report	Project Silver Winter - Bosnia Report	Navin Reddy			02. Litigation Privileged
AAI00001128	A	11/24/2021	10/28/2020	Report	Project Silver Winter - Interim Report	Navin Reddy			02. Litigation Privileged
AAI00001130	A	10/20/2020	10/20/2020	Internal work product	Untitled	Jolene - ArcticWind			02. Litigation Privileged
AAI00001131	A	10/20/2020	10/20/2020	Internal work product	MK Domains/Websites	Microsoft Office User			02. Litigation Privileged
AAI00001133	P	10/28/2020	10/28/2020	Email Message	Project Silver Winter - Interim Report 28 Oct 2020	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00001134	A	10/28/2020	10/28/2020	Report	Project Silver Winter - Interim Report	Navin Reddy			02. Litigation Privileged
AAI00001136	A	10/20/2020	10/20/2020	Internal work product	Untitled	Jolene - ArcticWind			02. Litigation Privileged
AAI00001141	A	10/21/2020	10/20/2020	Internal work product	Untitled	Jolene - ArcticWind			02. Litigation Privileged
AAI00001144	P	10/28/2020	10/28/2020	Email Message	FW: Project Silver Winter - Interim Report 28 Oct 2020	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001145	A	10/28/2020	9/27/2020	Web capture	Harvest Moon: Did Trulieve Overpay For Its Pennsylvania Entrance	Harvest Moon Research			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001146	A	10/28/2020	10/28/2020	Report	Project Silver Winter - Interim Report	Navin Reddy			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001149	P	1/27/2022	1/27/2022	Email Message	Investigator Reports / Anson Claim	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>	"Carlson, Andrew" <acarlson@dwpv.com>;"O'Sullivan, Maura" <mosullivan@dwpv.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001150	A	1/27/2022	12/18/2020	Report	Project Silver Winter -Bosnia Report	Navin Reddy			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001151	A	1/27/2022	10/28/2020	Report	Project Silver Winter - Interim Report	Navin Reddy			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001152	P	12/1/2020	12/1/2020	Email Message	Anson - website registration information	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001153	A	12/1/2020	10/28/2020	Report	Project Silver Winter - Interim Report	Navin Reddy			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001173	P	10/10/2020	10/10/2020	Email Message	RE: Quick Interim update & some further questions	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Navin Reddy" <navin.reddy@artemisrisk.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	02. Litigation Privileged
AAI00001174	A	10/10/2020	10/10/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			02. Litigation Privileged

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AAI00001177	P	9/30/2020	9/30/2020	Email Message	RE: Unlawful activity - https://moezkassam.com/	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	02. Litigation Privileged
AAI00001178	P	10/14/2020	10/14/2020	Email Message	RE: Project Silver Winter Discussion points - 14 Oct 20	"Sunny Puri" <spuri@ansonfunds.com>	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001179	A	10/14/2020	10/13/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			02. Litigation Privileged
AAI00001184	P	10/7/2020	10/7/2020	Email Message	RE: Letter of Engagement - Word Version	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Navin Reddy" <navin.reddy@artemisrisk.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Mark Watson" <mark.watson@artemisrisk.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001185	A	10/7/2020	10/7/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			02. Litigation Privileged
AAI00001199	P	10/5/2020	10/5/2020	Email Message	RE: Defamatory Website Analysis v1	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001200	A	10/5/2020	10/5/2020	Internal work product	Efforts to Have Defamatory Content Removed	Sunny Puri			02. Litigation Privileged
AAI00001211	P	10/5/2020	10/5/2020	Email Message	Defamatory Website Analysis v1	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001212	A	10/5/2020	10/5/2020	Internal work product	Efforts to Have Defamatory Content Removed	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001213	P	10/13/2020	10/13/2020	Email Message	Re: latest dili doc	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001214	A	10/13/2020	10/13/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001215	P	9/30/2020	9/30/2020	Email Message	RE: Unlawful activity - https://moezkassam.com/	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001218	P	9/27/2020	9/27/2020	Email Message	Re: Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes (privileged and confidential)	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001220	P	9/30/2020	9/30/2020	Email Message	RE: Unlawful activity - https://moezkassam.com/	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001221	P	9/30/2020	9/30/2020	Email Message	RE: Unlawful activity - https://moezkassam.com/	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001227	P	9/27/2020	9/27/2020	Email Message	RE: Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure – Capital Market Crimes (privileged and confidential)	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001228	A	9/27/2020	9/27/2020	Twitter message	Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure	info@moezkassam.com			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001229	A	9/27/2020	9/27/2020	Twitter message	Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure	info@moezkassam.com			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001232	P	10/9/2020	10/9/2020	Email Message	observations re site	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001233	A	10/9/2020	10/9/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001234	P	10/21/2020	10/21/2020	Email Message	Re: file	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001235	A	10/21/2020	10/21/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001242	P	10/9/2020	10/9/2020	Email Message	RE: Engagement Letter for Anson Funds with Attachment.pdf	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Mundiya, Tariq" <tmundiya@willkie.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001243	A	10/9/2020	10/9/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001246	A	10/5/2020	10/5/2020	Internal Work Product	Efforts to Have Defamatory Content Removed	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001251	A	10/9/2020	10/9/2020	Internal work product	Observations from Defamation Site (Website)	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001280	P	9/28/2020	9/28/2020	Email Message	RE: *TIME SENSITIVE* Defamatory Website under Public Domain Registry	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001281	A	9/28/2020	9/28/2020	Screen capture	Black Tusk Resources Inc.	Philmon Rezene			01. Solicitor Client communication; 02. Litigation Privileged

AAI00001367	P	9/28/2020	9/28/2020	Email Message	RE: *TIME SENSITIVE* Defamatory Website under Public Domain Registry	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001374	P	9/28/2020	9/28/2020	Email Message	RE: *TIME SENSITIVE* Defamatory Website under Public Domain Registry	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001375	A	9/28/2020	9/28/2020	Internal work product	Untitled	Philmon Rezene			02. Litigation Privileged
AAI00001401	P	12/14/2020	12/14/2020	Email Message	Re: Anson - Update	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001439	P	9/28/2020	9/28/2020	Email Message	RE: *TIME SENSITIVE* Defamatory Website under Public Domain Registry	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001440	P	9/28/2020	9/28/2020	Email Message	RE: *TIME SENSITIVE* Defamatory Website under Public Domain Registry	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001449	P	9/29/2020	9/29/2020	Email Message	RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001451	P	9/29/2020	9/29/2020	Email Message	RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001456	P	9/29/2020	9/29/2020	Email Message	Re: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001458	P	11/4/2020	11/4/2020	Email Message	RE: still not down and shows up in top search	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001557	P	9/29/2020	9/29/2020	Email Message	RE: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>		02. Litigation Privileged
AAI00001562	P	9/28/2020	9/28/2020	Email Message	RE: *TIME SENSITIVE* Defamatory Website under Public Domain Registry	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00001585	P	10/4/2020	10/4/2020	Email Message	RE: Anson/ C&F Partners	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Matteo Bigazzi" <mbigazzi@candfpartners.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	02. Litigation Privileged
AAI00001588	A	10/4/2020	10/3/2020	Internal work product	Untitled	Laura Salvatori			02. Litigation Privileged
AAI00001591	A	10/4/2020	9/28/2020	Internal work product	Untitled	Philmon Rezene			02. Litigation Privileged
AAI00001592	A	10/4/2020	10/4/2020	ZIP Archive	Untitled				02. Litigation Privileged
AAI00001651	P	10/5/2020	10/5/2020	Email Message	FW: *TIME SENSITIVE* CEASE AND DESIST - Defamatory Website under Public Domain Registry / Endurance	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001731	P	3/9/2021	3/9/2021	Email Message	Artemis Report	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001732	A	3/9/2021	3/9/2021	Report	Anson Funds Phase II - Due Diligence				02. Litigation Privileged
AAI00001750	P	3/9/2021	3/9/2021	Email Message	Artemis Report	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00001751	A	3/9/2021	3/9/2021	Presentation	Social Media Monitoring Phase II	Jolene - ArcticWind			01. Solicitor Client communication; 02. Litigation Privileged
AAI00001788	P	7/12/2021	7/12/2021	Email Message	RE: Reputation.ca - Welcome Email - Anson Funds	"Zubin Gada" <hi@zubingada.com>	"Courtney Stroh" <courtney.stroh@reputation.ca>;"Matt Earle" <matt@reputation.ca>	"Raphael Thurber" <raphael.thurber@reputation.ca>;"Michael Pennock" <mike.pennock@reputation.ca>;"spuri@ansonfunds.com" <spuri@ansonfunds.com>	02. Litigation Privileged
AAI00004421	P	12/10/2020	12/10/2020	Email Message	RE: Anson - Update: PRIVILEGED AND CONFIDENTIAL	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Tony Moore" <tmoore@ansonfunds.com>;"Amin Nathoo" <anathoo@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004422	A	12/10/2020	12/9/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004423	A	12/10/2020	12/9/2020	Draft Court Document	Affidavit of S. Puri - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004424	A	12/10/2020	12/8/2020	Draft Court Document	Notice of Motion - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004425	A	12/10/2020	12/10/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004429	P	12/9/2020	12/9/2020	Email Message	RE: Anson - Update (privileged and confidential)	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged

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AAI00004430	A	12/9/2020	12/8/2020	Tweet	Untitled	Laura Salvatori			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004432	A	12/9/2020	12/8/2020	Tweet	Untitled	Laura Salvatori			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004434	A	12/9/2020	12/8/2020	Draft Court Document	Notice of Motion - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004435	P	10/29/2020	10/29/2020	Email Message	RE: Project Silver Winter - Interim Report 28 Oct 2020	"Sunny Puri" <spuri@ansonfunds.com>	"Navin Reddy" <navin.reddy@artemisrisk.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00004437	P	10/29/2020	10/29/2020	Email Message	Re: Project Silver Winter - Interim Report 28 Oct 2020	"Navin Reddy" <navin.reddy@artemisrisk.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004447	P	12/9/2020	12/9/2020	Email Message	RE: Anson - Update	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004448	A	12/9/2020	12/8/2020	Tweet	Untitled	Laura Salvatori			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004449	A	12/9/2020	12/8/2020	Web capture	Moez Kassam and Anson at it again – you guys got off lightly				01. Solicitor Client communication; 02. Litigation Privileged
AAI00004450	A	12/9/2020	12/9/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004451	A	12/9/2020	12/8/2020	Tweet	Untitled	Laura Salvatori			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004452	A	12/9/2020	12/9/2020	Draft Court Document	Affidavit of S. Puri - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004453	A	12/9/2020	12/8/2020	Draft Court Document	Notice of Motion - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004454	P	12/7/2020	12/7/2020	Email Message	RE: Anson - Update	"Fischer, Iris" <iris.fischer@blakes.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004455	A	12/7/2020	12/7/2020	Draft Court Document	Affidavit of S. Puri - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004456	A	12/7/2020	12/7/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004457	A	12/7/2020	12/7/2020	Draft Court Document	Notice of Motion - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004458	A	12/7/2020	12/7/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004473	P	12/14/2020	12/14/2020	Email Message	FW: Anson - Update	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004474	A	12/14/2020	12/14/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004475	A	12/14/2020	12/14/2020	Draft Court Document	Affidavit of S. Puri - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004476	A	12/14/2020	12/14/2020	Draft Court Document	Notice of Motion Form 37A	DIMATTEO, CHRISTOPHER			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004477	A	12/14/2020	12/14/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004478	A	12/14/2020	12/14/2020	Draft Court Document	Affidavit of Service Form 16B	DIMATTEO, CHRISTOPHER			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004479	A	12/14/2020	12/14/2020	Draft Court Document	Notice of Motion - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged

SCHEDULE B

AAI00004480	P	12/14/2020	12/14/2020	Email Message	RE: Anson - Update	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004481	A	12/14/2020	12/14/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004482	A	12/14/2020	12/14/2020	Draft Court Document	Affidavit of S. Puri - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004483	A	12/14/2020	12/14/2020	Draft Court Document	Notice of Motion Form 37A	DIMATTEO, CHRISTOPHER			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004484	A	12/14/2020	12/14/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004485	A	12/14/2020	12/14/2020	Draft Court Document	Affidavit of Service Form 16B	DIMATTEO, CHRISTOPHER			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004486	A	12/14/2020	12/14/2020	Draft Court Document	Notice of Motion - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004501	P	12/15/2020	12/15/2020	Email Message	RE: Anson - Update	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004503	A	12/15/2020	12/14/2020	Draft Court Document	Affidavit of S. Puri	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004504	A	12/15/2020	12/14/2020	Draft Court Document	Notice of Motion - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004520	A	4/13/2021	4/13/2021	Draft Court Document	Amended Statement of Defence	GROIA & COMPANY			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004526	P	4/14/2021	4/14/2021	Email Message	RE: Correspondence from Blakes/Anson Funds	"Amin Nathoo" <anathoo@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Tony Moore" <tmoore@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004529	P	8/29/2021	8/29/2021	Email Message	RE: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Pulfer, Kaley" <kaley.pulfer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004531	P	10/20/2020	10/20/2020	Email Message	Re: Internet Tracker - 10.07.20	"Philmon Rezene" <prezene@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004533	P	4/13/2021	4/13/2021	Email Message	RE: RE: Correspondence from Blakes/Anson Funds	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004534	P	4/25/2021	4/25/2021	Email Message	Re: Correspondence from Blakes/Anson Funds	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004535	P	10/21/2022	10/21/2022	Email Message	Anson et al v. Doxtator et al	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>;"Carlson, Andrew" <acarlson@dwpv.com>	"Rob Staley" <StaleyR@bennettjones.com>;"Doug Fenton" <FentonD@bennettjones.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004540	P	5/26/2021	5/26/2021	Email Message	RE: Stockhouse Norwich application - Sunny's affidavit	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004541	A	5/26/2021	3/11/2021	Report	Stockhouse				01. Solicitor Client communication; 02. Litigation Privileged
AAI00004547	P	4/26/2021	4/26/2021	Email Message	FW: RE: RE: Correspondence from Blakes/Anson Funds	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004548	P	4/8/2021	4/8/2021	Email Message	Doxtator Defence	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004549	A	4/8/2021	4/8/2021	Draft Court Document	Reply and Defence - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004550	A	4/8/2021	4/8/2021	Draft Court Document	Reply and Defence to Counterclaim Form 25A 27C	DIMATTEO, CHRISTOPHER			01. Solicitor Client communication; 02. Litigation Privileged

AAI00004551	P	4/30/2021	4/30/2021	Email Message	RE: RE: RE: Correspondence from Blakes/Anson Funds	"Fischer, Iris" <iris.fischer@blakes.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004560	P	6/1/2021	6/1/2021	Email Message	RE: RE: RE: Correspondence from Blakes/Anson Funds	"Sunny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004561	A	6/1/2021	6/1/2021	Internal work product	Active vs. Inactive\Stockhouse Poster Names/Newly Found Active Links	Mark Baliwalla			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004571	A	7/20/2022	12/18/2020	Report	Project Silver Winter - Bosnia Report	Navin Reddy			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004573	P	6/11/2021	6/11/2021	Email Message	Re: Correspondence from Blakes/Anson Funds	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Fischer, Iris" <iris.fischer@blakes.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004582	P	10/6/2020	10/6/2020	Email Message	FW: K2 Intelligence NDA	"Moez Kassam" <mkassam@ansonfunds.com>	"foadmardukhi@hotmail.com" <foadmardukhi@hotmail.com>;"Sami Khoreibi" <skhoreibi@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004583	A	10/6/2020	10/6/2020	Letter	Untitled	Chris Ribeiro; Surjeet Mahant	Laura Salvatori		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004584	A	10/6/2020	10/6/2020	Letter	Professional Services Agreement	K2 Intelligence			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004594	P	11/2/2020	11/2/2020	Email Message	RE: Anson - Update	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>	"Mundiya, Tariq" <tmundiya@willkie.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004604	A	11/2/2020	11/2/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004605	P	12/18/2020	12/18/2020	Email Message	For files	"Sunny Puri" <spuri@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004606	A	12/18/2020	12/18/2020	Report	Project Silver Winter - Bosnia Report	Navin Reddy			02. Litigation Privileged
AAI00004607	P	10/7/2020	10/7/2020	Email Message	FW: K2 Intelligence NDA	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Danovitch, David E." <ddanovitch@sullivanlaw.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004608	A	10/7/2020	10/6/2020	Letter	Untitled		Laura Salvatori		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004609	A	10/7/2020	10/6/2020	Letter	Professional Services Agreement	K2 Intelligence			01. Solicitor Client communication; 02. Litigation Privileged
AAI00004610	P	4/9/2021	4/9/2021	Email Message	Re: Doxtator Defence	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004611	P	4/25/2021	4/25/2021	Email Message	RE: Correspondence from Blakes/Anson Funds	"Fischer, Iris" <iris.fischer@blakes.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004612	P	3/30/2021	3/30/2021	Email Message	stockhouse posts for names	"Sunny Puri" <spuri@ansonfunds.com>	"Mark Baliwalla" <mbaliwalla@ansonfunds.com>		02. Litigation Privileged
AAI00004616	A	3/8/2021	3/8/2021	List and Web Posts	All Names with Defamatory Post	Mark Baliwalla			02. Litigation Privileged
AAI00004849	P	12/18/2020	12/18/2020	Email Message	Bosnia Report	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00004850	A	12/18/2020	12/18/2020	Report	Project Silver Winter - Bosnia Report	Navin Reddy			02. Litigation Privileged
AAI00004853	P	10/6/2020	10/6/2020	Email Message	RE: K2 Intelligence NDA	"Chris Ribeiro" <CRibeiro@K2intelligence.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Erin Tennant" <etennant@K2intelligence.com>;"Surjeet Mahant" <smahant@k2intelligence.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	02. Litigation Privileged
AAI00004854	A	10/6/2020	10/6/2020	Letter	Untitled	Chris Ribeiro; Surjeet Mahant	Laura Salvatori		02. Litigation Privileged
AAI00004870	P	10/30/2020	10/30/2020	Email Message	FW: Anson - Update	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004871	A	10/30/2020	10/30/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged

AAI00004873	P	10/20/2020	10/20/2020	Email Message	Re: Internet Tracker - 10.07.20	"Philmon Rezene" <prezene@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004874	P	12/17/2020	12/17/2020	Email Message	Re: Anson - final claim and exhibits	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sun ny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004875	P	6/11/2021	6/11/2021	Email Message	Re: Correspondence from Blakes/Anson Funds	"Fischer, Iris" <iris.fischer@blakes.com>	"Sunny Puri" <spuri@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004876	P	8/23/2021	8/23/2021	Email Message	RE: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004878	P	9/29/2020	9/29/2020	Email Message	RE: moez defamatory site: new posts to take down	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004879	P	12/17/2020	12/17/2020	Email Message	RE: Anson - final claim and exhibits	"Sunny Puri" <spuri@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laur a Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004881	P	7/7/2021	7/7/2021	Email Message	RE: Norwich IP Analysis Data Pull	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004884	P	12/17/2020	12/17/2020	Email Message	Re: Anson - final claim and exhibits	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00004909	A	4/23/2021	4/23/2021	Report	Update 23042021	Jolene - ArcticWind			02. Litigation Privileged
AAI00004944	P	10/20/2020	10/20/2020	Email Message	FW: K2 Intelligence - Preliminary Findings	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Tariq Mundiya" <tmundiya@willkie.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"kaley.pulfe r@blakes.com" <kaley.pulfer@blakes.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00004945	A	10/20/2020	10/19/2020	Memorandum	Attribution Investigation – Preliminary Findings	K2 Intelligence, LLC	David Danovitch, Sullivan & Worcester LLP		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005003	P	10/29/2020	10/29/2020	Email Message	RE: K2 Intelligence - Preliminary Findings	"Chris Ribeiro" <CRibeiro@K2intelligence.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Nicoletta Kotsianas" <nkotsianas@k2intelligence.com>	02. Litigation Privileged
AAI00005004	A	10/29/2020	10/6/2020	Letter	Untitled	K2 Intelligence, LLC	Laura Salvatori		02. Litigation Privileged
AAI00005028	P	7/7/2021	7/7/2021	Email Message	RE: Stockhouse material	"Sunny Puri" <spuri@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005029	A	7/7/2021	7/7/2021	Internal work product	Reasons its Stafford	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005094	P	4/8/2021	4/8/2021	Email Message	RE: RE: Correspondence from Blakes/Anson Funds	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005095	P	4/13/2021	4/13/2021	Email Message	RE: RE: Correspondence from Blakes/Anson Funds	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005096	A	4/13/2021	4/13/2021	Draft Court Document	Untitled				01. Solicitor Client communication; 02. Litigation Privileged
AAI00005097	P	10/7/2020	10/7/2020	Email Message	RE: Removed Posts	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005099	P	8/18/2020	8/18/2020	Email Message	RE: Stockhouse (privileged and confidential)	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005103	P	3/18/2021	3/18/2021	Email Message	RE: Stockhouse letter	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged

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AAI00005104	P	4/15/2021	4/15/2021	Email Message	RE: Stockhouse - Notice of Motion	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005105	A	4/15/2021	4/15/2021	Draft Court Document	Notice of Application Form 14E	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005106	P	10/19/2020	10/19/2020	Email Message	K2 Intelligence - Preliminary Findings	"Chris Ribeiro" <CRibeiro@K2intelligence.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Erin Tennant" <etennant@K2intelligence.com>;"Nicoletta Kotsianas" <nkotsianas@k2intelligence.com>	02. Litigation Privileged
AAI00005107	A	10/19/2020	10/19/2020	Memorandum	Attribution Investigation – Preliminary Findings	K2 Intelligence, LLC	David Danovitch, Sullivan & Worcester LLP		02. Litigation Privileged
AAI00005108	P	8/2/2021	8/2/2021	Email Message	RE: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00005109	A	8/2/2021	8/1/2021	Internal work product	Reasons its Stafford	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005110	A	8/2/2021	8/1/2021	Draft Court Document	Amended Statement of Claim	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005111	A	8/2/2021	7/19/2021	Screen capture	Reconnaissance Energy Africa Ltd				01. Solicitor Client communication; 02. Litigation Privileged
AAI00005112	A	8/2/2021	8/2/2021	Internal work product	Untitled	Sunny Puri			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005113	P	4/9/2021	4/9/2021	Email Message	RE: Doxtator Defence	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005114	P	4/9/2021	4/9/2021	Email Message	FW: Doxtator Defence	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005115	A	4/9/2021	4/9/2021	Draft Court Document	Reply and Defence - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005116	A	4/9/2021	4/9/2021	Draft Court Document	Reply and Defence	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005117	P	11/26/2020	11/26/2020	Email Message	Online Tracker - 11.26.20	"Philmon Rezene" <prezene@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	02. Litigation Privileged
AAI00005118	A	11/26/2020	11/26/2020	Internal work product	Untitled	Philmon Rezene			02. Litigation Privileged
AAI00005119	P	4/26/2021	4/26/2021	Email Message	RE: Correspondence from Blakes/Anson Funds	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005120	P	4/9/2021	4/9/2021	Email Message	RE: Doxtator Defence	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005121	A	4/9/2021	4/9/2021	Draft Court Document	Reply and Defence to Counterclaim Form 25A 27C	DIMATTEO, CHRISTOPHER			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005123	P	12/17/2020	12/17/2020	Email Message	Re: Anson - final claim and exhibits	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005124	P	4/14/2021	4/14/2021	Email Message	Re: Correspondence from Blakes/Anson Funds	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005125	A	4/14/2021	4/14/2021	Draft Court Document	Untitled				01. Solicitor Client communication; 02. Litigation Privileged
AAI00005129	P	4/9/2021	4/9/2021	Email Message	RE: Doxtator Defence	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005130	P	7/19/2021	7/19/2021	Email Message	RE: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005131	A	7/19/2021	7/19/2021	Screen capture	Reconnaissance Energy Africa Ltd.				01. Solicitor Client communication; 02. Litigation Privileged

AAI00005132	P	3/25/2021	3/25/2021	Email Message	RE: Stockhouse Follow Up + Statement of Defense	"Fischer, Iris" <iris.fischer@blakes.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005133	A	3/25/2021	3/25/2021	Letter	Abusive Content about Anson Funds on Stockhouse	Iris Fischer (Blakes)	Gary Kelly Stockhouse Publishing Ltd.		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005134	P	4/15/2021	4/15/2021	Email Message	Stockhouse - Notice of Motion	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005135	A	4/15/2021	4/15/2021	Draft Court Document	Notice of Application Form 14E	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005137	P	7/23/2020	7/23/2020	Email Message	RE: calling you in 2 mins (privileged and confidential)	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005138	P	8/18/2020	8/18/2020	iCalendar	take down stockhouse	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>		01. Solicitor Client communication
AAI00005139	A	8/18/2020	8/18/2020	Email Message	RE: Stockhouse (privileged and confidential)	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005140	P	5/27/2021	5/27/2021	Email Message	Stockhouse motion - Affidavit commissioning	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Maringola, Jennifer" <jennifer.maringola@blakes.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005141	A	5/27/2021	5/27/2021	Draft Court Document	Exhibit A to the Affidavit of S. Puri	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005142	A	5/27/2021	5/27/2021	Draft Court Document	Affidavit of S. Puri	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005143	P	12/17/2020	12/17/2020	Email Message	FW: Anson - final claim and exhibits	"Fischer, Iris" <iris.fischer@blakes.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005144	P	4/9/2021	4/9/2021	Email Message	RE: Doxtator Defence	"Laura Salvatori" <lsvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005145	P	7/19/2021	7/19/2021	Email Message	FW: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005146	A	7/19/2021	7/19/2021	Screen capture	Reconnaissance Energy Africa Ltd.				01. Solicitor Client communication; 02. Litigation Privileged
AAI00005147	P	4/9/2021	4/9/2021	Email Message	RE: Doxtator Defence	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005148	A	4/9/2021	4/9/2021	Draft Court Document	Reply and Defence - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005149	A	4/9/2021	4/9/2021	Draft Court Document	Reply and Defence	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005150	P	10/4/2020	10/4/2020	Email Message	RE: intro	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005154	P	8/24/2021	8/24/2021	Email Message	RE: Bruiser Litigation Catch Up	"Fischer, Iris" <iris.fischer@blakes.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005155	A	8/24/2021	8/23/2021	Screen capture	Reconnaissance Energy Africa Ltd.				02. Litigation Privileged
AAI00005156	P	12/17/2020	12/17/2020	Email Message	RE: Anson - final claim and exhibits	"Fischer, Iris" <iris.fischer@blakes.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005158	P	4/21/2021	4/21/2021	Email Message	Re: Correspondence from Blakes/Anson Funds	"Laura Salvatori" <lsvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication
AAI00005159	P	3/18/2021	3/18/2021	Email Message	RE: Stockhouse letter	"Fischer, Iris" <iris.fischer@blakes.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication
AAI00005165	P	7/23/2020	7/23/2020	Email Message	RE: calling you in 2 mins (privileged and confidential)	"Laura Salvatori" <lsvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005167	P	6/14/2021	6/14/2021	Email Message	FW: RE: RE: RE: Correspondence from Blakes/Anson Funds	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication
AAI00005172	P	4/9/2021	4/9/2021	Email Message	RE: Doxtator Defence	"Laura Salvatori" <lsvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication
AAI00005175	P	8/16/2021	8/16/2021	Email Message	RE: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005176	A	8/16/2021	8/16/2021	Screen capture	Cokiga Damke				01. Solicitor Client communication; 02. Litigation Privileged

AAI00005177	A	4/20/2021	4/20/2021	Web Post	Anson Funds are the major short behind Reco's sell off	NemeCan			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005178	P	4/26/2021	4/26/2021	Email Message	RE: RE: RE: Correspondence from Blakes/Anson Funds	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005179	A	4/26/2021	4/26/2021	Internal work product	Previously Flagged Links/New	Laura Salvatori			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005180	P	6/1/2021	6/1/2021	Email Message	RE: RE: RE: Correspondence from Blakes/Anson Funds	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication
AAI00005181	P	6/1/2021	6/1/2021	Email Message	Re: RE: RE: Correspondence from Blakes/Anson Funds	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication
AAI00005182	P	4/15/2021	4/15/2021	Email Message	FW: Stockhouse - Notice of Motion Attribution Investigation – Preliminary Findings	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005284	A	10/19/2020	10/19/2020	Memorandum		K2 Intelligence, LLC			02. Litigation Privileged
AAI00005377	A	8/15/2022	8/15/2022	Draft Court Document	Letter of Request				02. Litigation Privileged
AAI00005378	A	8/15/2022	8/15/2022	Draft Court Document	Affidavit of S. Puri	Davies Ward Phillips & Vineberg LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005379	A	8/15/2022	8/15/2022	Reddit post	Corrupt Sunny Puri added to the board of Canadian Journalism Foundation	u/Mevlidak			02. Litigation Privileged
AAI00005380	A	8/15/2022	8/15/2022	Reddit post	Anson Funds deleting files following DOJ investigation	u/Rubarbarbara			02. Litigation Privileged
AAI00005384	P	10/21/2022	10/21/2022	Email Message	Anson Advisors et al. v. Doxtator et al.	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication
AAI00005385	P	8/23/2021	8/23/2021	Email Message	RE: Bruiser Litigation Catch Up	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005387	A	8/23/2021	8/23/2021	Screen capture	Reconnaissance Energy Africa Ltd.				02. Litigation Privileged
AAI00005388	A	8/23/2021	8/23/2021	Screen capture	Cokiga Damke				02. Litigation Privileged
AAI00005389	A	8/23/2021	8/18/2021	Email Message	RE: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	<lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00005391	A	8/23/2021	8/23/2021	Screen capture	Reconnaissance Energy Africa Ltd.				02. Litigation Privileged
AAI00005393	A	8/23/2021	8/23/2021	Draft Court Document	Amended Statement of Claim	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005395	A	8/23/2021	8/16/2021	Email Message	RE: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00005396	A	8/23/2021	8/23/2021	Screen capture	Cokiga Damke				02. Litigation Privileged
AAI00005397	A	8/23/2021	8/23/2021	Screen capture	Anson Funds are the major Short behind Reco's sell off				02. Litigation Privileged
AAI00005398	A	8/23/2021	8/2/2021	Internal work product	Untitled	Sunny Puri			02. Litigation Privileged
AAI00005400	A	10/30/2020	10/30/2020	Draft Court Document	Statement of Claim - Draft	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005401	P	7/27/2021	7/27/2021	Email Message	RE: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005402	A	7/27/2021	7/19/2021	Screen capture	Anson Funds are the major Short behind Reco's sell off				01. Solicitor Client communication; 02. Litigation Privileged
AAI00005403	P	5/12/2021	5/12/2021	Email Message	Stockhouse_Monitor_Phase_II-Grid_view.xls	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00005404	A	5/12/2021	5/12/2021	Internal work product	Stockhouse Monitor Phase II-Gri/Twitter Monitoring/Other online Incl. Reddit				02. Litigation Privileged
AAI00005406	P	6/2/2021	6/2/2021	Email Message	FW: Anson Advisors Inc. et al. v. Robert Lee Doxtator and Jacob Doxtator et al.	"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Fischer, Iris" <iris.fischer@blakes.com>	01. Solicitor Client communication
AAI00005407	A	6/2/2021	6/2/2021	Letter	Anson Advisors Inc. et al. v. Robert Lee Doxtator and Jacob Doxtator et al. Court File No. CV-20-00653410-00CL	Iris Fischer (Blakes)	Allen Spektor Joseph Groia and Trevor Fairlie (Groia & Company P.C. Lawyers)		01. Solicitor Client communication
AAI00005408	A	6/2/2021	6/2/2021	Draft Court Document	Factum of the Plaintiffs	Blake, Cassels & Graydon LLP			01. Solicitor Client communication
AAI00005409	A	6/2/2021	6/2/2021	Draft Court Document	Motion Record of the Plaintiffs	Blake, Cassels & Graydon LLP			01. Solicitor Client communication
AAI00005410	A	6/2/2021	6/2/2021	Draft Court Document	Book of Authorities	Blake, Cassels & Graydon LLP			01. Solicitor Client communication
AAI00005411	P	5/7/2021	5/7/2021	Email Message	Weekly_Update_07052021.docx	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		02. Litigation Privileged
AAI00005412	A	5/7/2021	4/30/2021	Report	Update 30042021	Jolene - ArcticWind			02. Litigation Privileged
AAI00005413	P	7/19/2021	7/19/2021	Email Message	FW: Bruiser Litigation Catch Up	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005416	P	5/25/2021	5/25/2021	Email Message	Stockhouse Norwich application - Sunny's affidavit	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005417	A	5/25/2021	5/25/2021	Draft Court Document	Affidavit of S. Puri	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged
AAI00005425	A	6/8/2021	6/8/2021	Draft Court Document	Affidavit of S. Puri	Blake, Cassels & Graydon LLP			01. Solicitor Client communication; 02. Litigation Privileged

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AAI00005426	P	8/3/2021	8/3/2021	Email Message	RE: Bruiser Litigation Catch Up	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00005428	P	10/4/2020	10/4/2020	Email Message	RE: intro	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005430	A	1/8/2021	12/18/2020	Report	Project Silver Winter - Bosnia Report	Navin Reddy			02. Litigation Privileged
AAI00005431	A	1/8/2021	12/17/2020	Report	Forensic Examination Report	Magnet Forensics			02. Litigation Privileged
AAI00005432	P	8/18/2020	8/18/2020	Email Message	RE: ATTN: MEMBER SUPPORT - Slandorous Posting *Time Sensitive*	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>		02. Litigation Privileged
AAI00005433	P	4/9/2021	4/9/2021	Email Message	RE: Doxtator Defence	"Sunny Puri" <spuri@ansonfunds.com>	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005501	P	4/18/2021	4/18/2021	Internal work product	Untitled	Mark Baliwalla			02. Litigation Privileged
AAI00005504	P	4/13/2021	4/13/2021	Email Message	twitter email	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	01. Solicitor Client communication; 02. Litigation Privileged
AAI00005939	P	10/5/2020	10/5/2020	Email Message	RE: proton email	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Luigi Calabrese" <lcalabrese@frontietworks.ca>;"Moez Kassam" <mkassam@ansonfunds.com>		02. Litigation Privileged
AAI00005997	P	10/7/2020	10/7/2020	Email Message	Re: from one firm	"Luigi Calabrese" <lcalabrese@frontietworks.ca>	"Moez Kassam" <mkassam@ansonfunds.com>		02. Litigation Privileged
AAI00006007	P	10/6/2020	10/6/2020	Email Message	Re: proton email	"Luigi Calabrese" <lcalabrese@frontietworks.ca>	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	02. Litigation Privileged
AAI00006186	P	10/7/2020	10/7/2020	Email Message	RE: from one firm	"Moez Kassam" <mkassam@ansonfunds.com>	"Luigi Calabrese" <lcalabrese@frontietworks.ca>		02. Litigation Privileged
AAI00006197	P	10/6/2020	10/6/2020	Email Message	Re: proton email	"Moez Kassam" <mkassam@ansonfunds.com>	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Luigi Calabrese" <lcalabrese@frontietworks.ca>	02. Litigation Privileged
AAI00006200	P	10/7/2020	10/7/2020	Email Message	FW: question re site	"Moez Kassam" <mkassam@ansonfunds.com>	"Luigi Calabrese (lcalabrese@frontietworks.ca)"" <lcalabrese@frontietworks.ca>		02. Litigation Privileged
AAI00006449	P	10/5/2020	10/5/2020	Email Message	RE: proton email	"Luigi Calabrese" <lcalabrese@frontietworks.ca>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		04. Redaction required
AAI00006505	P	10/5/2020	10/5/2020	Email Message	RE: proton email	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Luigi Calabrese" <lcalabrese@frontietworks.ca>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		02. Litigation Privileged
AAI00006539	P	10/15/2020	10/15/2020	Email Message	RE: send me full convo	"Luigi Calabrese" <lcalabrese@frontietworks.ca>	"Moez Kassam" <mkassam@ansonfunds.com>		02. Litigation Privileged
AAI00006540	A	10/15/2020	10/15/2020	Emails	Our previous communication on Anson Funds report	Luigi Calabrese			02. Litigation Privileged
AAI00006541	A	10/15/2020	10/15/2020	Emails	Our previous communication on Anson Funds report	Luigi Calabrese			02. Litigation Privileged
AAI00006542	A	10/15/2020	10/15/2020	Emails	Your mail to us on the Moez Kassam and Anson Funds Report	Luigi Calabrese			02. Litigation Privileged
AAI00006558	P	10/5/2020	10/5/2020	Email Message	RE: proton email	"Laura Salvatori" <lsalvatori@ansonfunds.com>	"Luigi Calabrese" <lcalabrese@frontietworks.ca>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		02. Litigation Privileged
AAI00006643	P	10/16/2020	10/16/2020	Email Message	FW: reach outs	"Moez Kassam" <mkassam@ansonfunds.com>	"Luigi Calabrese (lcalabrese@frontietworks.ca)"" <lcalabrese@frontietworks.ca>		02. Litigation Privileged
AAI00006644	A	10/16/2020	10/15/2020	Emails	Our previous communication on Anson Funds report	Luigi Calabrese			02. Litigation Privileged
AAI00006645	A	10/16/2020	10/15/2020	Emails	Our previous communication on Anson Funds report	Luigi Calabrese			02. Litigation Privileged
AAI00006646	A	10/16/2020	10/15/2020	Emails	Your mail to us on the Moez Kassam and Anson Funds Report	Luigi Calabrese			02. Litigation Privileged
AAI00006877	P	10/7/2020	10/7/2020	Email Message	from one firm	"Moez Kassam" <mkassam@ansonfunds.com>	"Luigi Calabrese (lcalabrese@frontietworks.ca)"" <lcalabrese@frontietworks.ca>		02. Litigation Privileged
AAI00010035	P	3/24/2021	3/24/2021	Draft Letter	Untitled	Navin Reddy			02. Litigation Privileged

SCHEDULE B

AAI00010119	P	10/6/2020	10/6/2020	Email Message	Re: proton email	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D129-MKASSAM>	"Sunny Puri" <spuri@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Luigi Calabrese" <lcalabrese@frontietworks.ca>	02. Litigation Privileged
AAI00010121	P	9/30/2020	9/30/2020	Email Message	RE: response	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D129-MKASSAM>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00010123	P	10/7/2020	10/7/2020	Email Message	from one firm	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D129-MKASSAM>	"Luigi Calabrese (lcalabrese@frontietworks.ca)" <lcalabrese@frontietworks.ca>		02. Litigation Privileged
AAI00010132	P	9/30/2020	9/30/2020	Email Message	From nate Anderson	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00010133	A	9/30/2020	9/30/2020	ZIP Archive	Chat				01. Solicitor Client communication; 02. Litigation Privileged
AAI00010134	A	9/30/2020	9/30/2020	Text File	Chat				02. Litigation Privileged
AAI00010143	P	10/5/2020	10/5/2020	Email Message	FW: tilray stockhouse, here is what we have	"Moez Kassam" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E55AE17069C6467A8E7A27B8395D129-MKASSAM>	"Laura Salvatori" <lsalvatori@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00010144	A	8/14/2020	8/14/2020	Stockhouse Web Post	Tilray Stock Message Board & Forum _ Moez Kassam and Anson Funds - Short Loses \$500 M On Tilray	westsidetrader			02. Litigation Privileged
AAI00010151	P	10/1/2020	10/1/2020	Email Message	Stafford to bruiser today	"Moez Kassam" <mkassam@ansonfunds.com>	"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		01. Solicitor Client communication; 02. Litigation Privileged
AAI00010152	A	10/1/2020	10/1/2020	Text Message	Harvest Moon X OilPrice	James Stafford, Robert Doxtator			01. Solicitor Client communication; 02. Litigation Privileged
AAI00010158	P	12/23/2020	12/23/2020	Chart	Internet Slander Tracker - 12.23.20				02. Litigation Privileged

Plaintiffs

ROBERT LEE DOXTATOR

Plaintiff by Counterclaim

-and- ROBERT LEE DOXTATOR et al.
Defendants

-and- ANSON ADVISORS INC. et al.
Defendants to the Counterclaim

Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
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PROCEEDING COMMENCED AT
TORONTO

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Court File No. CV-20-00653410-00CL

ANSON ADVISORS INC., et al.
Plaintiffs

-and-

STAFFORD, et al.
Defendants

DOXTATOR
Plaintiff to the Counterclaim

ANSON ADVISORS INC., et al.
Defendants to the Counterclaim

**ONTARIO
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COMMERCIAL LIST**

Proceeding commenced at Toronto

MOTION RECORD (VOLUME 1 OF 3)
(Motion to Compel Answers to Undertakings and Refusals)

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