

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/Moving Parties

- and -

STOCKHOUSE PUBLISHING LTD.

Responding Party

- and -

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

Defendants

MOTION RECORD OF THE PLAINTIFFS / MOVING PARTIES

June 2, 2021

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TAB 1

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

**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/Moving Parties

- and -

STOCKHOUSE PUBLISHING LTD.

Responding Party

- and -

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

Defendants

NOTICE OF MOTION

The Plaintiffs, Anson Advisors Inc., Anson Funds Management LP, Anson Investments Master Fund LP (together, “**Anson**”) and Moez Kassam (“**Kassam**”), will make a Motion to a Judge presiding over the Commercial List on June 11, 2021 at 9:30 am, or as soon after that time as the Motion can be heard, by judicial videoconference via Zoom at Toronto, Ontario.

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

THIS MOTION IS FOR:

- (a) an order that the Responding Party, Stockhouse Publishing Ltd. ("**Stockhouse**"), disclose to counsel for the Plaintiffs, within 15 days of receipt of a copy of the Order, the following information regarding the Stockhouse member accounts listed in **Schedule "A"** to this Notice of Motion:
- (i) the name(s) of the person(s) who registered each member account, if such name(s) were provided to Stockhouse;
 - (ii) all identifying and contact information provided by such person(s), including email addresses and/or telephone numbers;
 - (iii) if the member account is a paid account, which third party financial services provider would have payment information related to the member account ;
 - (iv) all Internet Protocol ("**IP**") addresses associated with the account and any IP history/user logs associated with the account; and
 - (v) any other documentation or information in Stockhouse's possession, power or control that could identify the person(s) who created and/or accessed and/or is otherwise associated with each member account;

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- (b) the costs of this motion, plus all applicable taxes, against any party that opposes the relief sought; and
- (c) such further and other relief as to this Honourable Court may seem just.

THE GROUNDS FOR THE MOTION ARE:

A. OVERVIEW OF THIS MOTION

- (a) The Plaintiffs, Anson and Kassam, are the targets of a sophisticated and coordinated conspiracy to damage their business and reputations (the “**Conspiracy**”). In this action, the Defendants Robert and Jacob Doxtator and other individuals whose identity is not known to the Plaintiffs are alleged to have maliciously published and broadly disseminated false, defamatory, abusive and harassing material about Anson, Kassam and other Anson employees in several forums, including on the Internet and through social media.
- (b) As part of the Conspiracy, individuals whose identities are unknown to the Plaintiffs (the “**Abusive Posters**”) have systematically and repeatedly abused the Stockhouse online platform – a message board website popular in the investor community – to anonymously publish defamatory and harassing material about the Plaintiffs, beginning in summer 2020 and continuing to the present (the “**Abusive Posts**”). The Abusive Posters often used “burner” Stockhouse member accounts that have public-facing monikers that do not reflect the true identity of the user or users and were

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created specifically for the purpose of concealing their true identities and facilitating their defamation campaign against the Plaintiffs.

- (c) The Abusive Posts falsely and maliciously assert, among other things, that Kassam is a criminal and that he and Anson engage in a wide range of illegal and unethical conduct, including market manipulation, fraud, insider trading, cyber crimes, and other breaches of securities laws and regulations. These allegations have harmed and continue to harm Anson and Kassam's business and reputations in the investment industry. As an investment firm and its principal, Anson and Kassam's success depends on investors' willingness to trust them with their capital. The Abusive Posts – which falsely allege that Anson and Kassam are dishonest, untrustworthy, immoral, unethical and unscrupulous criminals – strike at the root of that trust and threaten to undermine their goodwill and good reputations.
- (d) Due to the steps taken by the Abusive Posters to conceal their identities, Anson and Kassam do not know, and have no way to determine on their own, the identities of the person(s) who published the Abusive Posts on Stockhouse. Anson and Kassam seek an order compelling Stockhouse to disclose to the Plaintiffs' counsel any identifying information in its possession, power and control regarding Stockhouse member accounts used to publish the Abusive Posts.
- (e) The relief sought in this motion should be granted on an urgent basis. The Abusive Posters have been publishing Abusive Posts on Stockhouse since

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summer 2020. There is a significant risk that they will continue to do so with impunity. Moreover, Anson and Kassam bring this motion within the underlying action that they commenced in the Ontario Superior Court of Justice (Commercial List), which seeks damages and other relief including with respect to the Abusive Posts (the “**Claim**”). Anson and Kassam require the identities of the Abusive Posters so that they can identify and prosecute the Claim against all proper Defendants; attempt to address the damage that has already occurred; and prevent further unlawful statements and Abusive Posts from being published in the future.

B. THE PARTIES AND BACKGROUND

- (f) Anson Advisors Inc., a corporation incorporated under the laws of Ontario, is a private asset management firm that serves as the co-investment advisor, exempt market dealer and portfolio manager for the Anson Funds.
- (g) Anson Funds Management LP is a Dallas limited partnership that serves as the investment fund manager for Anson Funds.
- (h) Anson Investments Master Fund LP is Anson Funds’ flagship investment fund.
- (i) Moez Kassam is a principal and a founder of Anson, as well as a director, the Chief Executive Officer, and the Chief Investment Officer of Anson Advisors Inc. He founded Anson Investments Master Fund LP’s predecessor fund in July 2007 at the age of 26 and has since built Anson

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into a billion-dollar investment firm. Kassam is the face of Anson and is well known in the industry in that role.

- (j) Stockhouse is a corporation incorporated under the laws of British Columbia. It operates a popular website in the investment community that provides market news and analysis regarding companies with small market capitalizations and message boards for users to discuss securities issuers.
- (k) On December 18, 2020, Anson and Kassam issued the Claim, which seeks damages of \$100,000,000 jointly and severally against the Defendants, plus aggravated and punitive damages, for defamation, conspiracy, false light, intentional interference with economic relations, and appropriation of personality.
- (l) In addition to the Defendants Robert Doxtator and Jacob Doxtator, the Defendants include the unknown “John Doe” Defendants. These are individuals whose identities are presently unknown to Anson and Kassam but who are believed to have the means and business motivation to seek to harm them. They are believed to be involved in publishing the Abusive Posts and/or are themselves the Abusive Posters or are working with the Abusive Posters.

C. THE ABUSIVE POSTS AND THE CONSPIRACY AGAINST ANSON AND KASSAM

- (m) From July 2020 and continuing through to the present, the Abusive Posters have anonymously published a litany of Abusive Posts on the Stockhouse

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website, which serve no purpose other than to bully, harass and defame Anson and its employees. Over one thousand such posts have been published. The Abusive Posts violate the Stockhouse website's terms and conditions of use.

- (n) The Abusive Posters published the Abusive Posts on message boards dedicated to well-known publicly traded companies, including General Electric, Wells Fargo, Coca Cola, Morgan Stanley, Mastercard, Aphria, Tilray, Paypal, Bank of Montreal and Toronto Dominion Bank, and broadly disseminated the Abusive Posts through social media. The Abusive Posters took this approach as part of a specific scheme and design to draw maximum attention to the Abusive Posts and cause maximum harm to Anson and Kassam.
- (o) The Stockhouse member accounts that, to Anson's knowledge, have been used to publish Abusive Posts are listed in **Schedule "A"** to this Notice of Motion. There are 109 such accounts that Anson is aware of, many of which published multiple Abusive Posts. Other Stockhouse member accounts aside from those listed in Schedule "A" have also been used to publish Abusive Posts. Only those accounts currently known to Anson are listed in **Schedule "A"**.
- (p) The Abusive Posts are a significant component of the Conspiracy to defame, harass and abuse Anson and Kassam. The Abusive Posts and the broader Conspiracy are described in greater detail below.

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(i) Summer 2020 Stockhouse posts

(q) As set out in the Claim, in July and August 2020 and in furtherance of the Conspiracy, the Abusive Posters began to anonymously publish the Abusive Posts on Stockhouse message boards, which were viewed by many thousands of individuals. The Abusive Posts published in summer 2020 included the following:

- (i) on July 23, 2020, Stockhouse user “JustinTime” published a post titled “The Real Story on Moez Kassam and Anson Funds – Part 1”;
- (ii) on August 14, 2020, Stockhouse user “evtrader” published a post titled “Moez Kassam and Anson Funds – Short \$500 M And Lose It All”;
- (iii) on August 17, 2020, Stockhouse user “Bundyj” published a post titled “The Real Story on what happened with Moez Kassam and Aphria”; and
- (iv) on August 28, 2020, Stockhouse user “stocknysyrup” published a post titled “Moez Kassam and Anson at it again – you guys got off lightly”.

(r) Following communications between the Plaintiffs and Stockhouse, and in light of its website terms and conditions of use (which prohibit unlawful and defamatory content), Stockhouse agreed to remove the Abusive Posts described above from its website.

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(ii) Defamatory Manifesto and other unlawful allegations against Anson and Kassam

- (s) Despite the removal of the Summer 2020 Abusive Posts, the Conspiracy continued to target Anson and Kassam through other means, including false, malicious and defamatory Tweets and social media posts.
- (t) On or around September 27, 2020, a lengthy Internet post – a 20-page false and defamatory rant titled “Moez Kassam and Anson Funds: A Tale of Corruption, Greed and Failure” – was anonymously published on the website www.MoezKassam.com (the “**Defamatory Manifesto**”) under the pseudonym “The Match Man”. The Defamatory Manifesto includes baseless and defamatory allegations such as the following:

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.

- (u) While Anson and Kassam were able to have the Defamatory Manifesto removed from the website on which it was originally published, it was quickly re-published on other websites. In fall 2020, links to the Defamatory Manifesto were broadly shared on social media, particularly on Twitter, along with further abusive and false allegations against Anson and Kassam.

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- (v) The Defamatory Manifesto remains accessible online as of the date of this motion.

(iii) *Fall 2020 Stockhouse posts*

- (w) Throughout September, October and November 2020, the Abusive Posters anonymously published a series of additional Abusive Posts on Stockhouse. The headline tags for these Posts included:

- (i) “Time’s Up”;
- (ii) “Expose Moez Kassam”;
- (iii) “Tale of Corruption”;
- (iv) “These short sellers soured the entire cannabis market”;
- (v) “Check out this piece on short selling bandits in Canada”; and
- (vi) “A big scandal might be unfolding in Canadian markets”.

- (x) Several of the Abusive Posts published in fall 2020 included links to the Defamatory Manifesto.

- (y) The Abusive Posters used different Stockhouse member accounts to publish Abusive Posts in fall 2020, including accounts with the usernames “penismighty”, “cool888”, “thorgb1”, “Findingmoney”, “SandraZ”, “ErikaGross”, “Shooter300”, “DrinkDrank1”, “Bossman24”, “Hardy4” and “DeRoan”.

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- (z) For example, Stockhouse user “DrinkDrank1” anonymously published the following Abusive Post on October 29, 2020 on a message board dedicated to ExxonMobil. This Post includes a link to the Defamatory Manifesto and encourages readers to send “tips” and other information regarding Anson and Kassam to the authors of the Defamatory Manifesto:

Looks like the Moez Kassam Report is back up

Investigative report looks at 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.

Report is here: [link to the Defamatory Manifesto]

The rumours are a second report is coming soon that is even more explosive. They have a tip line as well, so anyone with information might want to send something in.

- (aa) Following communications between the Plaintiffs and Stockhouse, and in light of its website terms and conditions of use, Stockhouse has removed all of the Abusive Posts that were brought to its attention.

(iv) March 2021 Abusive Posts

- (bb) The Abusive Posters published a further litany of Abusive Posts on Stockhouse in March 2021, targeting Anson, Kassam, and Anson employee Sunny Puri. The headline tags associated with these Abusive Posts included the following:

- (i) “How embarrassing: Another scandal for this hedge fund”;
- (ii) “Looks like these guys are in trouble again”;

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- (iii) “Notorious short selling fund in trouble”;
 - (iv) “Sunny Puri wants to know the truth – here it is Sunny Puri”;
 - (v) “Canadian Hedge Fund Under SEC Investigation”;
 - (vi) “Anson Funds under SEC Investigation – Do Unitholders know”; and
 - (vii) “100K Reward for info leading to conviction of Anson Funds”.
- (cc) Many of the Abusive Posts published during this period contained identical or very similar text and included serious false and defamatory personal allegations against Anson, Kassam and Puri, including that Kassam and Puri have engaged in “multiple blackmail operations”; that Anson and its employees are under regulatory investigation and commit crimes; and that Kassam had Puri’s telephone and workstation tapped and logged.
- (dd) The Abusive Posters used many different Stockhouse accounts to publish Abusive Posts anonymously in March 2021, including accounts with the usernames: “Halfordjackson”, “FlowerDejeune”, “KarimKa”, “VonFurstenberg”, “Benjamineraim”, “GordonGatsby”, “RodPirate”, “FabbyDebbie”, “Implications”, “Antid0te”, “Aladdinn”, “KingJohn97”, “Frankmasterson”, “JohannaJenni”, “TheGrapeOne” and “SlapTheAskUni”.
- (ee) For example, on March 7, 2021, Stockhouse user “FabbyDebbie” published an Abusive Post that included the following false and defamatory allegations:

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Canadian Hedge Fund Under SEC Investigation

We all know Anson Funds – the group run by criminal Moez Kassam [link to Defamatory Manifesto].

Well something we have just found out from a number of senior members within Anson itself is that they are under SEC investigation. They have been for some time as they received their first letter some time ago. But what has got them really spooked is the second letter that came from the SEC. This is apparently a BAD one. Wire Fraud, Insider Trading, possible money laundering – a host of issues the regulator has with them. And this is the SEC!

- (ff) Stockhouse has voluntarily removed from its website the Abusive Posts that were brought to its attention on the grounds that such posts violate its website terms and conditions, which prohibit content that is “false, misleading, unlawful...harmful, threatening, defamatory, libelous, abusive, inflammatory, harassing, vulgar, obscene, fraudulent, [or] invasive of privacy or publicity rights”.

D. THE COURT SHOULD GRANT THE ORDER REQUESTED

- (gg) The Plaintiffs seek an order requiring Stockhouse to disclose all identifying information in its possession, power and control regarding the member accounts used to publish Abusive Posts. This information is not privileged. It is necessary to identify the proper parties to this action and hold them to account for their unlawful conduct, and to cease the ongoing abuse against Anson. It would be unfair to require the Plaintiffs to proceed without this information.

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- (hh) The Plaintiffs have a *bona fide* claim against the Abusive Posters. They are alleged to be parties to a sophisticated, coordinated Conspiracy to target Anson and Kassam and damage their business and reputations by making and disseminating defamatory and harassing allegations.
- (ii) Stockhouse is more than a mere witness to the defamation against the Plaintiffs and is involved in the acts complained of. Stockhouse's website has been used by the Abusive Posters, contrary to its intended purpose, as a platform for defamatory and harassing allegations against the Plaintiffs. Stockhouse has cooperated with the Plaintiffs in the past to remove Abusive Posts from its platform.
- (jj) Stockhouse is the only practical source for the information sought. The Abusive Posts were published anonymously using Stockhouse member accounts whose usernames do not identify the individuals who published the Posts. Many of these user accounts were created shortly before the Abusive Posts at issue were published, and specifically for the purpose of concealing the Abusive Posters' identities and enabling them to target the Plaintiffs anonymously. The ordinary discovery process is not an adequate substitute because the Plaintiffs do not know the identities of all proper Defendants to the Claim.
- (kk) The Plaintiffs will compensate Stockhouse for costs incurred in complying with the order requested.
- (ll) Stockhouse does not oppose the relief sought.

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- (mm) The Plaintiffs' interest in holding the Abusive Posters to account for publishing the Abusive Posts outweighs any potential contrary interest of the Abusive Posters. The Abusive Posters maliciously abused the Stockhouse platform in order to publish illegal, harassing, bullying and defamatory material about the Plaintiffs. The Abusive Posts were published in contravention of the Stockhouse website terms and conditions and, on that basis, Stockhouse has removed Abusive Posts brought to its attention. The Abusive Posters have no reasonable expectation of anonymity in the circumstances.
- (nn) The interests of justice and the public interest favour disclosure. Obtaining information about the Abusive Posters at this stage is proportionate, will increase the efficiency of this litigation, and will not cause undue delay. The Abusive Posts contain the most serious and egregious kind of defamatory allegations. They have been disseminated widely on the Internet, have caused damage to the Plaintiffs, and were published in order to damage the Plaintiffs' business and reputations. The Plaintiffs are entitled to prosecute their claims against the Abusive Posters. To do so, they need this information from Stockhouse.

This motion should be heard urgently

- (ii) This motion should be heard on an expedited basis. If the Plaintiffs and this Court do not know the Abusive Posters' identities, the Plaintiffs cannot prosecute their action against them, and any remedies obtained by the

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Plaintiffs in this action will be futile. These remedies must be ordered against every person involved in the Conspiracy, or else the Conspirators may continue their defamation campaign against the Plaintiffs through new proxies.

- (jj) It is important that this litigation proceed quickly. The Conspiracy has caused, and continues to cause, serious harm to the Plaintiffs' business and reputations, which is still unfolding and growing daily. Additional Abusive Posts could be published at any time, as hundreds have been published at various times in the last nine months.
- (oo) Rules 1.04(1), 2.03, 3.02, 30 (including 30.01) 31 (including 31.10), 37, 39 and 57 of the *Rules of Civil Procedure*, as amended.
- (pp) Such further and other grounds as the lawyers may advise.
- (qq) The following documentary evidence will be used at the hearing of the motion:
 - (i) Affidavit of Sunny Puri, to be affirmed; and
 - (ii) such further and other evidence as the lawyers may advise and this Honourable Court may permit.

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June 2, 2021

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SCHEDULE "A"**List of Stockhouse Member Accounts that, to Anson's knowledge, have published Abusive Posts**

No.	Member Account User Name	Link to Account Member Page
1.	PatientDawg2016	https://stockhouse.com/members/patientdawg2016
2.	DeepakSh	https://stockhouse.com/members/deepaksh
3.	evtrader	https://stockhouse.com/members/evtrader
4.	paulys	https://stockhouse.com/members/paulys
5.	Takingarisk	https://stockhouse.com/members/takingarisk
6.	Vanillagorilla	https://stockhouse.com/members/vanillagorilla
7.	Bundyj	https://stockhouse.com/members/bundyj
8.	FunGuy88	https://stockhouse.com/members/funguy88
9.	gghalmer	https://stockhouse.com/members/gghalmer
10.	JerryBo	https://stockhouse.com/members/jerrybo
11.	Froggy1	https://stockhouse.com/members/Froggy1
12.	maplestock	https://stockhouse.com/members/maplestock
13.	stocksnsyrup	https://stockhouse.com/members/stocknsyrup
14.	RodneySeid	https://stockhouse.com/members/rodneyseid
15.	thorgb1	https://stockhouse.com/members/thorgb1
16.	Silentbull	https://stockhouse.com/members/silentbull
17.	cool888	https://stockhouse.com/members/cool888
18.	wembley	https://stockhouse.com/members/wembley
19.	AllBeefNoFiller	https://stockhouse.com/members/allbeefnofiller
20.	Zimmee1	https://stockhouse.com/members/zimmee1
21.	penismightier	https://stockhouse.com/members/penismightier
22.	HubbardBlvdTO	https://stockhouse.com/members/hubbardblvdto
23.	stocktracker	https://stockhouse.com/members/stocktracker
24.	Steven1964	https://stockhouse.com/members/steven1964
25.	gottahunch	https://stockhouse.com/members/gottahunch
26.	Lisa1234	https://stockhouse.com/members/lisa1234

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No.	Member Account User Name	Link to Account Member Page
27.	OldSchool	https://stockhouse.com/members/oldschool
28.	jupitercanada01	https://stockhouse.com/members/jupitercanada01
29.	Findingmoney	https://stockhouse.com/members/findingmoney
30.	truthseeker1	https://stockhouse.com/members/truthseeker1
31.	TOP3STOCKS	https://stockhouse.com/members/top3stocks
32.	Imelda	https://stockhouse.com/members/imelda
33.	Jamestango	https://stockhouse.com/members/jamestango
34.	KhalidZ	https://stockhouse.com/members/khalidz
35.	DiegoHuerta	https://stockhouse.com/members/diegohuerta
36.	MariaS	https://stockhouse.com/members/marias
37.	EnriqueL	https://stockhouse.com/members/enriqueel
38.	Goldcross	https://stockhouse.com/members/goldcross
39.	RainbowRunner	https://stockhouse.com/members/RainbowRunner
40.	greendaze	https://stockhouse.com/members/greendaze
41.	HopefulJuan	https://stockhouse.com/members/hopefuljuan
42.	mydogchach	https://stockhouse.com/members/mydogchach
43.	CannabisExpert	https://stockhouse.com/members/cannabisexpert
44.	SandraZ	https://stockhouse.com/members/sandraz
45.	AlbertoN	https://stockhouse.com/members/alberton
46.	zoe18	https://stockhouse.com/members/zoe18
47.	JimmyH	https://stockhouse.com/members/jimmyh
48.	MichaW	https://stockhouse.com/members/michaw
49.	Steve0123	https://stockhouse.com/members/steve0123
50.	BCBigBud	https://stockhouse.com/members/bcbigbud
51.	Schocor	https://stockhouse.com/members/schocor
52.	GregorStauffer	https://stockhouse.com/members/gregorstauffer
53.	BelenOli	https://stockhouse.com/members/belenoli
54.	HannaJensen	https://stockhouse.com/members/hannajensen
55.	ErikaGross	https://stockhouse.com/members/erikagross
56.	ArmandDu	https://stockhouse.com/members/armanddu

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No.	Member Account User Name	Link to Account Member Page
57.	sollmg	https://stockhouse.com/members/sollmg
58.	EdithFay	https://stockhouse.com/members/edithfay
59.	Oilspecs	https://stockhouse.com/members/oilspecs
60.	dotslashcompile	https://stockhouse.com/members/dotslashcompile
61.	shooter300	https://stockhouse.com/members/shooter300
62.	Randumbtasks	https://stockhouse.com/members/Randumbtasks
63.	JordiKal	https://stockhouse.com/members/jordikal
64.	Hardy4	https://stockhouse.com/members/hardy4
65.	DrinkDrank	https://stockhouse.com/members/DrinkDrank
66.	Bossman24	https://stockhouse.com/members/bossman24
67.	MoeMoney	https://stockhouse.com/members/moemoney
68.	fellowship	https://stockhouse.com/members/fellowship
69.	UniqueKitty	https://stockhouse.com/members/uniquekitty
70.	MorganMorgan12	https://stockhouse.com/members/morganmorgan12
71.	ToffRaffles	https://stockhouse.com/members/toffraffles
72.	edwardoboo79	https://stockhouse.com/members/edwardoboo79
73.	newcoin	https://stockhouse.com/members/newcoin
74.	superstockpick	https://stockhouse.com/members/superstockpick
75.	Jackeden	https://stockhouse.com/members/jackeden
76.	TruthBeTold7	https://stockhouse.com/members/truthbetold7
77.	DeRoan	https://stockhouse.com/members/deroon
78.	Halfordjackson	https://stockhouse.com/members/halfordjackson
79.	FlowerDejeune	https://stockhouse.com/members/flowerdejeune
80.	VonFurstenberg	https://stockhouse.com/members/vonfurstenberg
81.	KarimKa	https://stockhouse.com/members/karimka
82.	Benjamineraim	https://stockhouse.com/members/benjamineraim
83.	GordonGatsby	https://stockhouse.com/members/gordongatsby
84.	RodPirate	https://stockhouse.com/members/rodpirate
85.	FabbyDebbie	https://stockhouse.com/members/fabbydebbie
86.	Implications	https://stockhouse.com/members/implications

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No.	Member Account User Name	Link to Account Member Page
87.	Antid0te	https://stockhouse.com/members/antid0te
88.	Aladdinn	https://stockhouse.com/members/aladdinn
89.	KingJohn97	https://stockhouse.com/members/kingjohn97
90.	Frankmasterson	https://stockhouse.com/members/frankmasterson
91.	JohannaJenni	https://stockhouse.com/members/johannajenni
92.	TheGrapeOne	https://stockhouse.com/members/thegrapeone
93.	NorthOntKid	https://stockhouse.com/members/northontkid
94.	TheMoneyMaker1	https://stockhouse.com/members/themoneymaker1
95.	SlapTheAskUni	https://stockhouse.com/members/slaptheaskuni
96.	3DThree	https://stockhouse.com/members/3dthree
97.	quinlash	https://stockhouse.com/members/quinlash
98.	Burdensome4	https://stockhouse.com/members/burdensome4
99.	DodgeCharger68	https://stockhouse.com/members/DodgeCharger68
100.	Smatteson	https://stockhouse.com/members/smatteson
101.	westsidetrader	https://stockhouse.com/members/westsidetrader
102.	juniorbullalive	https://stockhouse.com/members/juniorbullalive
103.	StewartOregon	https://stockhouse.com/members/stewartoregon
104.	DrehMann	https://stockhouse.com/members/drehmann
105.	RuslanP	https://stockhouse.com/members/ruslanp
106.	PrivJan9	https://stockhouse.com/members/privjan9
107.	J46738	https://stockhouse.com/members/j46738
108.	knowszero	https://stockhouse.com/members/knowszero
109.	maplesyrupcan	https://stockhouse.com/members/maplesyrupcan

ANSON ADVISORS INC.
et al.
Plaintiffs / Moving Parties

-and-

STOCKHOUSE
PUBLISHING LTD.
Responding Party

-and-

ROBERT DOXTATOR and JACOB DOXTATOR et al.
Defendants
Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Proceeding commenced at Toronto

NOTICE OF MOTION

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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/Moving Parties

- and -

STOCKHOUSE PUBLISHING LTD.

Responding Party

- and -

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

Defendants

**AFFIDAVIT OF SUNNY PURI
(Affirmed May 27, 2021)**

I, Sunny Puri, of the City of Toronto, in the Province of Ontario, MAKE OATH AND
SAY:

1. I am a Portfolio Manager at the Plaintiff, Anson Advisors Inc. I have worked at Anson Advisors Inc. since 2013 and am involved in all aspects of its business.

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2. Prior to my work at Anson (as defined below), I was an associate at RBC Capital Markets from 2010 to 2012 and a Senior Associate at PricewaterhouseCoopers from 2007 to 2010. I hold a Bachelor of Business Administration degree (Honours) in Accounting and Finance from the Schulich School of Business at York University and have a Chartered Professional Accountant designation.

3. I have knowledge of the matters discussed in this Affidavit. Where my knowledge is based upon information and belief, I refer to the sources of that information and believe it to be true.

A. OVERVIEW AND SUMMARY OF MY AFFIDAVIT

4. I affirm this Affidavit in support of this motion brought by Anson and one of its principals, Moez Kassam ("**Kassam**"), for an order requiring Stockhouse Publishing Ltd. ("**Stockhouse**") to disclose to the Plaintiffs information concerning certain Stockhouse member accounts.

5. The Statement of Claim in this action is attached as **Exhibit "A"** (the "**Claim**"). As set out in the Claim, the Plaintiffs are the targets of a sophisticated and coordinated conspiracy to damage their business and reputations (the "**Conspiracy**"). In the Conspiracy, the Defendants Robert and Jacob Doxtator, and other individuals whose identities are not known to the Plaintiffs, are alleged to have maliciously published and broadly disseminated false, defamatory, abusive and harassing material about the Plaintiffs and other Anson employees in several forums, including via the Internet and social media.

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6. In one component of the Conspiracy, individuals whose identities are unknown to the Plaintiffs (the “**Abusive Posters**”) have repeatedly abused Stockhouse — a message board website popular in the investor community — to publish defamatory, harassing material about the Plaintiffs anonymously, beginning in summer 2020 (the “**Abusive Posts**”). As set out below, the Abusive Posters appear to have often used “burner” Stockhouse member accounts that have public-facing monikers that do not reflect the true identity of the member or members controlling the account. Many of these member accounts appear to have been created specifically for the purpose of concealing the members’ true identities to facilitate the Conspiracy.

7. The Abusive Posts on Stockhouse falsely and maliciously assert, among other things, that Kassam is a criminal and that he and Anson engage in a wide range of illegal and unethical conduct, including market manipulation, fraud, insider trading, cyber crimes, and other breaches of securities laws and regulations. These allegations have harmed, and continue to harm, Anson and Kassam’s reputations in the investment industry. As an investment firm and its principal, Anson and Kassam’s success depends on investors’ willingness to trust them with their capital. The Abusive Posts strike at the root of that trust and threaten to undermine the Plaintiffs’ goodwill and good reputations.

8. As set out below, the Plaintiffs have no way to determine on their own who published the Abusive Posts because Stockhouse does not require its users to publish posts under their actual names. Accordingly, the Plaintiffs seek an order compelling Stockhouse to disclose to the Plaintiffs’ counsel any identifying information in its

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possession, power or control regarding certain Stockhouse member accounts used to publish the Abusive Posts, as follows:

- (a) the name(s) of the person(s) who registered each member account, if such name(s) were provided to Stockhouse;
 - (b) all identifying and contact information provided by such person(s), including email addresses and/or telephone numbers;
 - (c) if the member account is a paid account, which third party financial services provider has payment information related to the member account;
 - (d) all Internet Protocol ("**IP**") addresses associated with the account and any IP history/user logs associated with the account; and
 - (e) any other documentation or information in Stockhouse's possession, power or control that could identify the person(s) who created and/or accessed and/or is otherwise associated with each member account.
9. Stockhouse does not oppose the relief sought.
10. In this affidavit, I will:
- (a) describe the parties to this motion;
 - (b) describe the Plaintiffs' Claim in the underlying action;
 - (c) summarize the Abusive Posts published on Stockhouse between summer 2020 and March 2021 and the broader Conspiracy against the Plaintiffs;

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- (d) set out the Plaintiffs' correspondence with Stockhouse on these issues; and
- (e) explain why Stockhouse is the only practical source of information about the Abusive Posters' identities.

B. THE PARTIES

11. Anson Advisors Inc. ("**AAI**") 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.

12. Anson Funds Management LP ("**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.

13. Anson Investments Master Fund LP ("**AIMF**") is a Cayman Islands exempted limited partnership. It is Anson Funds' flagship investment fund.

14. In this affidavit, I refer to AAI, AFM and AIMF collectively as "**Anson**". While I am employed by AAI, I am involved with and have knowledge of all Anson entities and make this Affidavit on behalf of all Plaintiffs.

15. Moez Kassam is a principal and founder of Anson, as well as a director and the Chief Executive Officer and Chief Investment Officer of AAI. Kassam is 40 years old. He founded Saunders Capital Master Fund LP, the predecessor to AIMF, in July 2007 at the

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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, where he serves 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.

16. 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 2020 alone, the Moez & Marissa Kassam Foundation donated over half a million dollars to various Canadian charitable entities.

17. 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 in this role.

18. The responding party to this motion, Stockhouse, is a corporation incorporated under the laws of British Columbia. It operates a website popular in the investment

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community that provides market news and analysis regarding companies with small market capitalizations and message boards for users to discuss securities issuers.

C. THE PLAINTIFFS' CLAIM

19. On December 18, 2020, Anson and Kassam issued the Claim (which is attached as Exhibit "A"). In the Claim, the Plaintiffs seek damages of \$100,000,000 jointly and severally against the Defendants, plus aggravated and punitive damages, for defamation, conspiracy, false light, intentional interference with economic relations, and appropriation of personality.

20. In addition to the named Defendants Robert Doxtator and Jacob Doxtator, the Plaintiffs have also named unknown "John Does" as Defendants. The "John Does" are individuals whose identities are presently unknown to the Plaintiffs but who are believed to have the means and business motivation to seek to harm them. The "John Does" are believed to be involved in publishing the Abusive Posts and/or are themselves the Abusive Posters or working with them.

D. THE ABUSIVE POSTS AND THE CONSPIRACY AGAINST ANSON AND KASSAM

(i) Overview of the Abusive Posts

21. From July 2020 and continuing through March 2021, the Abusive Posters have anonymously published a litany of Abusive Posts on the Stockhouse website, which bully, harass and defame Anson and its employees. To Anson's knowledge, over one thousand Abusive Posts have been published on Stockhouse.

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22. Anson has conducted a thorough investigation into the Abusive Posts. That investigation is summarized below.

23. The Abusive Posters published Abusive Posts on Stockhouse message boards dedicated to well-known publicly traded companies, including General Electric, Wells Fargo, Coca Cola, Morgan Stanley, Mastercard, Aphria, Tilray, Paypal, Bank of Montreal and Toronto Dominion Bank. I believe they did so in order to draw maximum attention to the Abusive Posts and cause harm to the Plaintiffs. The Abusive Posts have also been broadly disseminated through the Internet and social media.

24. The Stockhouse member accounts that, to Anson's knowledge, have been used to publish Abusive Posts are listed in **Schedule "A"** to my affidavit. There are 109 such accounts of which Anson is aware, many of which published multiple Abusive Posts. Many other Stockhouse member accounts aside from those listed in Schedule "A" have also been used to publish Abusive Posts, but the Plaintiffs do not know the specific Stockhouse member names for those other accounts.

25. The Abusive Posts contain serious and inflammatory defamatory allegations against Anson and Kassam. I believe that they were published specifically in order to damage the Plaintiffs' business and reputations.

26. The Abusive Posts are a significant component of the Conspiracy to defame, harass and abuse Anson and Kassam. The Abusive Posts and the broader Conspiracy are described in greater detail below.

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(ii) Summer 2020 Abusive Posts

27. As set out in the Claim, Abusive Posters began to anonymously publish the Abusive Posts on Stockhouse message boards in July and August 2020. Copies of Abusive Posts published in summer 2020 are attached as **Exhibit “B”**. (Where the text of certain Posts is too small to be legible, copies with enlarged text are also included in Exhibit “B”.) The summer 2020 Abusive Posts were viewed by many thousands of individuals.

28. The summer 2020 Abusive Posts included the following:

- (a) on July 23, 2020, Stockhouse member “JustinTime” published a Post titled “The Real Story on Moez Kassam and Anson Funds – Part 1”;
- (b) on August 14, 2020, Stockhouse member “evtrader” published a Post titled “Moez Kassam and Anson Funds – Short \$500 M And Lose It All”;
- (c) on August 17, 2020, Stockhouse member “Bundyj” published a Post titled “The Real Story on what happened with Moez Kassam and Aphria”; and
- (d) on August 28, 2020, Stockhouse member “stocknysyrup” published a Post titled “Moez Kassam and Anson at it again – you guys got off lightly”.

29. By way of example, the July 23 Abusive Post called Kassam a “criminal” and accused him of engaging in illegal, unethical and “corrupt” business practices. It included the following text:

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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.

[...]

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 behaviour. [Emphasis added.]

30. In particular, the July 23 Abusive Post discussed Anson's investment in the cannabis company Tilray Inc. ("**Tilray**"). It falsely asserted that, during this period, Anson had "a large naked short position" in Tilray, which posed a "significant credit risk" to Anson's creditors, and that Anson "committed numerous securit[ies] violations as every favour imaginable would have been utilized in an effort to protect the funds [sic] solvency."

The Post concluded as follows:

So that's the end of part one. Over the next few days I will be revealing some of [Kassam's] 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 [Investment Industry Regulatory Organization of Canada, a regulator], juicy bits coming for you folks.

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31. The August 14 Abusive Post, titled “Moez Kassam and Anson Funds – Short \$500 M And Lose It All”, made similar allegations to the July 23 Post, including the false allegation that the Plaintiffs “lost \$500 million on a Tilray short”.

32. The August 17 Abusive Post was titled “The Real story on what happened with Moez Kassam and Aphria”. It alleged that Anson invested in Aphria Inc. (“**Aphria**”) but that, following their “failed short campaign against Tilray”, the Plaintiffs “became desperate” and “decided to betray [Kassam’s] friends and colleagues at Aphria”. The Post falsely claimed, among other things, that the Plaintiffs commissioned a third party analyst to publish negative material regarding Aphria, using insider information supplied by the Plaintiffs, so that Anson could profit from taking a short position in Aphria. The August 17 Abusive Post included the following text:

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....

Kassam has betrayed nearly everyone he knows, so he will run out of friends soon and even is sociopathic game-taking won’t work much longer.

Copy and share as I’m sure Moez will try to have this post removed.

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

34. Finally, the August 28 Abusive Post was titled “Moez Kassam and Anson at it again – you guys got off lightly”. It alleged that Anson invested in Zenabis Inc. (“**Zenabis**”) and

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then appointed a “stooge”, Adam Spears, to Zenabis’ board. Among other things, it falsely 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” so that Anson could profit from a short position in Zenabis. It also 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!”

35. The August 28 Abusive Post concluded with the following text:

Kassam completely destroyed Zenabis and its shareholders, and it was illegal every step of the way, from insider trading to failures to disclose, to a line-up of feeder funds...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.

(iii) Abusive Posts violate Stockhouse website terms and conditions

36. Following communications between the Plaintiffs and Stockhouse, Stockhouse agreed to remove the summer 2020 Abusive Posts from its website.

37. The Abusive Posts described above violate Stockhouse’s website terms and conditions of use, a copy of which are attached as **Exhibit “C”**. The terms and conditions contain the following provisions:

STOCKHOUSE NETWORK OF SITES PROHIBITED USER CONTENT AND CONDUCT

You will not and will not permit any third party to...

post on or through any of the Stockhouse Network of Sites...any of Your Information, including without limitation User Content...that is or that Stockhouse deems to be false, misleading, unlawful, promoting unlawful or criminal activities, harmful, threatening, defamatory, libelous, infringing,

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abusive, inflammatory, harassing, vulgar, obscene, fraudulent, invasive of privacy or publicity rights, sexually exploitative, hateful and/or racially, ethnically or otherwise objectionable... [or]

intimidate or harass another.

(iv) Defamatory Manifesto and other unlawful allegations against Anson and Kassam

38. Despite the removal of the summer 2020 Abusive Posts from Stockhouse, the Conspiracy continued to target Anson and Kassam through other means, including false, malicious and defamatory Tweets and social media posts.

39. As set out in the Claim, on or around September 27, 2020, a lengthy Internet post — a 20-page false and defamatory rant titled “Moez Kassam and Anson Funds: A Tale of Corruption, Greed and Failure” — was anonymously published on the website www.MoezKassam.com (the “**Defamatory Manifesto**”) under the pseudonym “The Match Man”. It was viewed by tens of thousands of individuals. A copy of the Defamatory Manifesto is attached as **Exhibit “D”**.

40. The Defamatory Manifesto includes baseless and defamatory allegations such as the following passage (which appears at the outset of the document):

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.

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41. The Defamatory Manifesto repeated and expanded upon false and defamatory allegations made in the summer 2020 Abusive Posts. In particular, it reiterated and expanded upon the false allegations regarding Tilray, Aphria and Zenabis.

42. While the Plaintiffs were able to have the Defamatory Manifesto removed from the website on which it was originally published (www.MoezKassam.com), it was quickly re-published on other websites, including the following:

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

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

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44. In fall 2020, and pursuant to the Conspiracy, links to the Defamatory Manifesto were broadly shared on social media, particularly on Twitter.

45. Social media and other Internet platforms were also used to spread further abusive and false allegations against Anson and Kassam.

(v) *Fall 2020 Abusive Posts*

46. Throughout September, October and November 2020, the Abusive Posters anonymously published a series of additional Abusive Posts on Stockhouse. The headline tags for the fall 2020 Abusive Posts included 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”.

47. Many of the fall 2020 Abusive Posts included links to the Defamatory Manifesto.

48. For example, on October 1, 2020, Stockhouse member “ErikaGross” published the following Abusive Post on the Stockhouse message board for Bluma Wellness Inc. (a Florida cannabis company):

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A big scandal might be unfolding in Canadian markets

Interesting investigative piece looking at a short selling group that have scammed investors out of billions. The original site has been DDOS attacked but you can read the report they don't want you to read here: [archived link to the Defamatory Manifesto]

And here (this one is a bit slow but it does load):
[another archived link to the Defamatory Manifesto]

49. A copy of this Abusive Post is attached as **Exhibit "E"**.
50. Similarly, on October 29, 2020, Stockhouse member "DrinkDrank1" anonymously published the following Abusive Post on Stockhouse's ExxonMobil message board. This Post also includes a link to the Defamatory Manifesto and encourages readers to send "tips" regarding Anson and Kassam to the Manifesto's authors:

Looks like the Moez Kassam Report is back up

Investigative report looks at 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.

Report is here: [link to Defamatory Manifesto on www.MarketCrimes.to].

The rumors are a second report is coming soon that is even more explosive. They have a tip line as well, so anyone with information might want to send something in.

51. A copy of this Abusive Post is attached as **Exhibit "F"**.
52. Many different Stockhouse member accounts were used to anonymously publish Abusive Posts in fall 2020, including accounts with the usernames "penismightner", "cool888", "thorgb1", "Findingmoney", "SandraZ", "ErikaGross", "Shooter300", "DrinkDrank1", "Bossman24", "Hardy4" and "DeRoan". It is obvious that these usernames

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are not the real names of the account holders or posters. Many of these accounts appear to be “burner” accounts created specifically for the purpose of concealing the members’ true identities to facilitate the Conspiracy and the dissemination of Abusive Posts. Many of these member accounts were created shortly before they were used to publish Abusive Posts about the Plaintiffs.

(vi) March 2021 Abusive Posts

53. The Abusive Posters published a further litany of Abusive Posts on Stockhouse in March 2021, targeting Anson, Kassam and me. The headline tags associated with these Abusive Posts included 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”.

54. Many different Stockhouse member accounts were used to anonymously publish Abusive Posts in March 2021. Again, many of these accounts appear to be “burner”

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accounts created specifically for the purpose of concealing the members' true identities to facilitate the Conspiracy and the dissemination of Abusive Posts. For example:

- (a) Stockhouse member accounts "Benjaimefrain", "Gordon Gatsby", "RodPirate", "FabbyDebbie", "Implications", "Antid0te", "Aladdinn", "KingJohn97", "Frankmasterson" and "JohannaJenni" were all used to publish Abusive Posts on March 7, 2021. These member accounts were created on the very same day.
- (b) Similarly, Stockhouse member accounts "Halfordjackson", "FlowerDejeune", "VonFurstenberg" and "KarimKa" were created between March 1 and 4, 2021 — either the same day, or the day before, they were first used to publish Abusive Posts.

55. Many of the Abusive Posts published in March 2021 contained identical or very similar text and included serious false and defamatory personal allegations against Anson, Kassam and me. The false allegations included that Kassam and I have engaged in "multiple blackmail operations", that Anson and its employees are under regulatory investigation and commit crimes, and that Kassam had my telephone and workstation tapped and logged.

56. By way of example, on March 7, 2021, Stockhouse member "FabbyDebbie" published an Abusive Post containing the following text, a copy of which is attached as **Exhibit "G"**:

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Canadian Hedge Fund Under SEC Investigation

We all know Anson Funds – the group run by criminal Moez Kassam [link to Defamatory Manifesto on www.MarketFrauds.to].

Well something we have just found out from a number of senior members within Anson itself is that they are under SEC investigation. They have been for some time as they received their first letter some time ago. But what has got them really spooked is the second letter that came from the SEC. This is apparently a BAD one. Wire Fraud, Insider Trading, possible money laundering – a host of issues the regulator has with them. And this is the SEC!

[...]

I don't know but if I was a unitholder I would have a lot of questions for Moez and Anson, especially around the SEC. Moez has a leak problem within Anson. He has employees phones monitored and all of their activities checked and they all have the threat of \$100 million lawsuits against them.

But Moez people do not thrive in an atmosphere of fear and threats. Resentment and anger builds and now many of your people have broken ranks – they are spilling the beans on your criminal enterprise. The SEC info was supposed to be only known by a tight group, but your people can't help talking Moez. It's because deep in their souls they know you for what you are, and they want the truth to get out. People are no longer scared of you. You have hurt hundreds of companies and thousands of people with your bullying, hit pieces, social media bashing and outright lies. You have cost thousands of jobs and stolen billions of Dollars from retail investors. The bill for your multitude of crimes is coming due very soon. And a light will be shone on the banks who have facilitated your criminal behavior (TD, RBC, CIBC and Scotia) – Scotia why do you never learn.

I think the next few months will be very revealing as the veil around Anson Funds is drawn back. Much more on this to come. I also wanted to add a note to Anson employees. This is the beginning of the end for criminal employers. You have a small window to go [to] the authorities with what you know.

Forget the lawsuits Anson have threatened you with – they are nonsense. You have whistleblower protection. Use this.

If you won't do it because it's the right thing. Then do it to protect your asses.

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This is a govt agency with will and real political juice. It will not be swept under the carpet like Moez is claiming and just because you aren't running the show doesn't mean the authorities won't come after you with the full power of the law. Here is an archived version of the first report as well [archived link to Defamatory Manifesto].

57. The text of this Post is virtually identical to an Abusive Post published on the same day (March 7, 2021) by Stockhouse member "RodPirate". A copy of the latter Abusive Post is attached as **Exhibit "H"**.

58. As set out above, Anson is aware of over 1,000 Abusive Posts published on Stockhouse between September 2020 and March 2021.

E. STOCKHOUSE DOES NOT OPPOSE THE RELIEF SOUGHT

59. On March 18, 2021, the Plaintiffs' counsel sent Stockhouse a letter about the flood of Abusive Posts published on its platform. A copy of the letter is attached as **Exhibit "I"**. The letter included a description of Anson's investigation into the Abusive Posts published since September 2020. The letter also advised Stockhouse that the Abusive Posts violated its website terms and conditions.

60. In the letter, the Plaintiffs requested that Stockhouse, among other things, remove the Abusive Posts and disclose all information in its possession about the Abusive Posters' identities, including email and IP addresses and contact information.

61. Stockhouse responded to the Plaintiffs' letter by email dated March 29, 2021, a copy of which is attached as **Exhibit "J"**. Stockhouse advised that it would continue to work with the Plaintiffs to remove Abusive Posts from its website. Stockhouse also stated that it would not oppose an order compelling it to disclose identifying information about

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the Abusive Posters. Stockhouse requested that the Plaintiffs send it a draft of the disclosure motion before the motion was filed in court so that Stockhouse could confirm its position.

62. By email dated April 7, 2021, the Plaintiffs' counsel sought clarification from Stockhouse of certain logistical matters related to obtaining the court order, including confirmation of the type of member information that Stockhouse preserves (and that could be disclosed pursuant to a court order). The Plaintiffs also solicited Stockhouse's input into how a disclosure order should be structured and undertook to send Stockhouse a draft of the notice of motion before it was filed. A copy of this email is attached as **Exhibit "K"**.

63. Stockhouse responded by email dated April 7, 2021. It provided the requested feedback on the form of the disclosure order and clarified the member account information that it is able to produce. A copy of this email is attached as **Exhibit "L"**.

64. On April 16, 2021, the Plaintiffs' counsel emailed Stockhouse a draft of the notice of motion. A copy of this email is attached as **Exhibit "M"**.

65. By email dated April 19, 2021, Stockhouse responded with comments on the draft notice of motion. A copy of this email is attached as **Exhibit "N"**. In its comments, Stockhouse further clarified the type of member information in its possession and offered to remove any defamatory Abusive Posts still accessible on its website.

66. On April 20, 2021, the Plaintiffs' counsel sent Stockhouse an updated version of the notice of motion that was revised in accordance with Stockhouse's comments, and a

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list of the Abusive Posts that remained accessible on Stockhouse's website. A copy of this email is attached as **Exhibit "O"**.

67. On April 23, 2021, Stockhouse responded, confirming that it would not oppose the motion. Stockhouse also confirmed that the Abusive Posts identified by the Plaintiffs had been removed from the Stockhouse website. A copy of Stockhouse's email is attached as **Exhibit "P"**.

68. The Plaintiffs and Stockhouse continued to correspond in the remainder of April 2021 regarding the removal of further Abusive Posts from the Stockhouse website.

69. Stockhouse has voluntarily removed all Abusive Posts that the Plaintiffs have brought to its attention because they violate its website terms and conditions. However, the Abusive Posters are continuing to publish Abusive Posts on Stockhouse.

F. STOCKHOUSE IS THE ONLY PRACTICAL SOURCE OF INFORMATION ABOUT THE ABUSIVE POSTERS' IDENTITIES

70. As set out above, in this motion, the Plaintiffs seek an order requiring Stockhouse to disclose all identifying information in its possession, power or control regarding the member accounts used to publish the Abusive Posts. The Plaintiffs require this information to identify the proper parties to this action, hold them to account for their conduct, and seek a remedy to cease the ongoing abuse against Anson.

71. The Abusive Posters have used Stockhouse's website, contrary to its intended purpose, as a platform to make defamatory and harassing allegations about the Plaintiffs.

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Stockhouse has cooperated with the Plaintiffs in removing Abusive Posts from its platform.

72. The Privacy Policy for the Stockhouse website is attached as **Exhibit “Q”**. The Privacy Policy states, in relevant part:

Stockhouse Publishing Ltd. (“us”, “we”, or “our”) operates the stockhouse.com website (hereinafter referred to as the “Service”). This Policy applies to Stockhouse Publishing Ltd., its subsidiaries, and any of its websites containing the Stockhouse name....

By using the Service, you agree to the collection and use of information in accordance with this policy....

Under certain circumstances, Stockhouse Publishing Ltd. may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

73. Anson and I believe that Stockhouse is the only practical source of information about the Abusive Posters’ identities that is available to the Plaintiffs. The Abusive Posts were published anonymously using Stockhouse member accounts whose usernames do not identify the individuals who published the Posts. Many of these member accounts were created shortly before the Abusive Posts at issue were published.

74. Robert and Jacob Doxtator’s Statements of Defence in this action are, respectively, attached as **Exhibits “R” and “S”**. As set out in those pleadings, both Robert and Jacob Doxtator deny being members of the Conspiracy or knowing who its members are.

75. Stockhouse has advised the Plaintiffs that it has the following information relating to the Abusive Posters:

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- (a) a validated email address, which is necessary to set up a Stockhouse member account; and
- (b) the IP addresses associated with each Post published by a member account.

76. Stockhouse has also advised that it may have a name associated with the individual who registered a member account, but that for most accounts it would not have that information. Some Stockhouse members choose to purchase paid accounts, and when an account has been paid for, Stockhouse has advised that a third-party financial services provider would store any financial information associated with the member account.

77. As set out above, Stockhouse does not oppose the requested order.

78. The Plaintiffs will compensate Stockhouse for any costs it incurs in complying with the order sought.

AFFIRMED remotely by Sunny Puri of the City of Toronto, in the Province of Ontario, before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, *Administering Oath or Declaration Remotely.*



Commissioner for Taking Affidavits
(or as may be)

Jenniter Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.



SUNNY PURI

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SCHEDULE "A"**List of Stockhouse Member Accounts that,
to Anson's knowledge, have published Abusive Posts**

No.	Member Account User Name	Link to Account Member Page
1.	PatientDawg2016	https://stockhouse.com/members/patientdawg2016
2.	DeepakSh	https://stockhouse.com/members/deepaksh
3.	evtrader	https://stockhouse.com/members/evtrader
4.	paulys	https://stockhouse.com/members/paulys
5.	Takingarisk	https://stockhouse.com/members/takingarisk
6.	Vanillagorilla	https://stockhouse.com/members/vanillagorilla
7.	Bundyj	https://stockhouse.com/members/bundyj
8.	FunGuy88	https://stockhouse.com/members/funguy88
9.	gghalmer	https://stockhouse.com/members/gghalmer
10.	JerryBo	https://stockhouse.com/members/jerrybo
11.	Froggy1	https://stockhouse.com/members/Froggy1
12.	maplestock	https://stockhouse.com/members/maplestock
13.	stocksnsyrup	https://stockhouse.com/members/stocknsyrup
14.	RodneySeid	https://stockhouse.com/members/rodneyseid
15.	thorgb1	https://stockhouse.com/members/thorgb1
16.	Silentbull	https://stockhouse.com/members/silentbull
17.	cool888	https://stockhouse.com/members/cool888
18.	wembley	https://stockhouse.com/members/wembley
19.	AllBeefNoFiller	https://stockhouse.com/members/allbeefnofiller
20.	Zimmee1	https://stockhouse.com/members/zimmee1
21.	penismightier	https://stockhouse.com/members/penismightier
22.	HubbardBlvdTO	https://stockhouse.com/members/hubbardblvdto
23.	stocktracker	https://stockhouse.com/members/stocktracker
24.	Steven1964	https://stockhouse.com/members/steven1964
25.	gottahunch	https://stockhouse.com/members/gottahunch
26.	Lisa1234	https://stockhouse.com/members/lisa1234

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No.	Member Account User Name	Link to Account Member Page
27.	OldSchool	https://stockhouse.com/members/oldschool
28.	jupitercanada01	https://stockhouse.com/members/jupitercanada01
29.	Findingmoney	https://stockhouse.com/members/findingmoney
30.	truthseeker1	https://stockhouse.com/members/truthseeker1
31.	TOP3STOCKS	https://stockhouse.com/members/top3stocks
32.	Imelda	https://stockhouse.com/members/imelda
33.	Jamestango	https://stockhouse.com/members/jamestango
34.	KhalidZ	https://stockhouse.com/members/khalidz
35.	DiegoHuerta	https://stockhouse.com/members/diegohuerta
36.	MariaS	https://stockhouse.com/members/marias
37.	EnriqueL	https://stockhouse.com/members/enriqueel
38.	Goldcross	https://stockhouse.com/members/goldcross
39.	RainbowRunner	https://stockhouse.com/members/RainbowRunner
40.	greendaze	https://stockhouse.com/members/greendaze
41.	HopefulJuan	https://stockhouse.com/members/hopefuljuan
42.	mydogchach	https://stockhouse.com/members/mydogchach
43.	CannabisExpert	https://stockhouse.com/members/cannabisexpert
44.	SandraZ	https://stockhouse.com/members/sandraz
45.	AlbertoN	https://stockhouse.com/members/alberton
46.	zoe18	https://stockhouse.com/members/zoe18
47.	JimmyH	https://stockhouse.com/members/jimmyh
48.	MichaW	https://stockhouse.com/members/michaw
49.	Steve0123	https://stockhouse.com/members/steve0123
50.	BCBigBud	https://stockhouse.com/members/bcbigbud
51.	Schocor	https://stockhouse.com/members/schocor
52.	GregorStauffer	https://stockhouse.com/members/gregorstauffer
53.	BelenOli	https://stockhouse.com/members/belenoli
54.	HannaJensen	https://stockhouse.com/members/hannajensen
55.	ErikaGross	https://stockhouse.com/members/erikagross
56.	ArmandDu	https://stockhouse.com/members/armanddu

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No.	Member Account User Name	Link to Account Member Page
57.	sollmg	https://stockhouse.com/members/sollmg
58.	EdithFay	https://stockhouse.com/members/edithfay
59.	Oilspecs	https://stockhouse.com/members/oilspecs
60.	dotslashcompile	https://stockhouse.com/members/dotslashcompile
61.	shooter300	https://stockhouse.com/members/shooter300
62.	Randumbtasks	https://stockhouse.com/members/Randumbtasks
63.	JordiKal	https://stockhouse.com/members/jordikal
64.	Hardy4	https://stockhouse.com/members/hardy4
65.	DrinkDrank	https://stockhouse.com/members/DrinkDrank
66.	Bossman24	https://stockhouse.com/members/bossman24
67.	MoeMoney	https://stockhouse.com/members/moemoney
68.	fellowship	https://stockhouse.com/members/fellowship
69.	UniqueKitty	https://stockhouse.com/members/uniquekitty
70.	MorganMorgan12	https://stockhouse.com/members/morganmorgan12
71.	ToffRaffles	https://stockhouse.com/members/toffraffles
72.	edwardoboo79	https://stockhouse.com/members/edwardoboo79
73.	newcoin	https://stockhouse.com/members/newcoin
74.	superstockpick	https://stockhouse.com/members/superstockpick
75.	Jackeden	https://stockhouse.com/members/jackeden
76.	TruthBeTold7	https://stockhouse.com/members/truthbetold7
77.	DeRoon	https://stockhouse.com/members/deroon
78.	Halfordjackson	https://stockhouse.com/members/halfordjackson
79.	FlowerDejeune	https://stockhouse.com/members/flowerdejeune
80.	VonFurstenberg	https://stockhouse.com/members/vonfurstenberg
81.	KarimKa	https://stockhouse.com/members/karimka
82.	Benjaminefraim	https://stockhouse.com/members/benjaminefraim
83.	GordonGatsby	https://stockhouse.com/members/gordongatsby
84.	RodPirate	https://stockhouse.com/members/rodpirate
85.	FabbyDebbie	https://stockhouse.com/members/fabbydebbie
86.	Implications	https://stockhouse.com/members/implications

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No.	Member Account User Name	Link to Account Member Page
87.	Antid0te	https://stockhouse.com/members/antid0te
88.	Aladdinn	https://stockhouse.com/members/aladdinn
89.	KingJohn97	https://stockhouse.com/members/kingjohn97
90.	Frankmasterson	https://stockhouse.com/members/frankmasterson
91.	JohannaJenni	https://stockhouse.com/members/johannajenni
92.	TheGrapeOne	https://stockhouse.com/members/thegrapeone
93.	NorthOntKid	https://stockhouse.com/members/northontkid
94.	TheMoneyMaker1	https://stockhouse.com/members/themoneymaker1
95.	SlapTheAskUni	https://stockhouse.com/members/slaptheaskuni
96.	3DThree	https://stockhouse.com/members/3dthree
97.	quinlash	https://stockhouse.com/members/quinlash
98.	Burdensome4	https://stockhouse.com/members/burdensome4
99.	DodgeCharger68	https://stockhouse.com/members/DodgeCharger68
100.	Smatteson	https://stockhouse.com/members/smatteson
101.	westsidetrader	https://stockhouse.com/members/westsidetrader
102.	juniorbullalive	https://stockhouse.com/members/juniorbullalive
103.	StewartOregon	https://stockhouse.com/members/stewartoregon
104.	DrehMann	https://stockhouse.com/members/drehmann
105.	RuslanP	https://stockhouse.com/members/ruslanp
106.	PrivJan9	https://stockhouse.com/members/privjan9
107.	J46738	https://stockhouse.com/members/j46738
108.	knowszero	https://stockhouse.com/members/knowszero
109.	maplesyrupcan	https://stockhouse.com/members/maplesyrupcan

ANSON ADVISORS INC.
et al.
Plaintiffs / Moving Parties

-and-

STOCKHOUSE
PUBLISHING LTD.
Responding Party

-and-

ROBERT DOXTATOR and JACOB
DOXTATOR et al.
Defendants

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

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Proceeding commenced at Toronto

AFFIDAVIT OF SUNNY PURI

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Lawyers for the Plaintiffs/ Moving Parties

This is Exhibit "A" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.



Court File No.

Electronically issued
Délivré par voie électronique : 18-Dec-2020
Toronto

**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 -

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 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 court office: Superior Court of Justice
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

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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, 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 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 individuals 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

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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 Robert Lee Doxtator and Jacob Doxtator have engaged in a scheme with each other and other unknown individuals 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. They 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”;

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- (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 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.]”; and
- (i) Kassam and Anson “just use people and don’t pay anyone but themselves”.

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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, who are located in Canada and likely the United States, 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 the indicia of fraudulent “pump and dump” schemes. In a pump and dump scheme, the perpetrators

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attempt to inflate the value of a stock through false or misleading statements 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 related parties 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 conducts short sales, its scrutiny may threaten the 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.

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11. A “naked” short sale occurs 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.

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 the various individuals involved applying standard financial analysis to 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 40 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, where he serves as Education Officer. He sits on the boards of directors of the Canadian Olympic Foundation, Toronto Public Library Foundation, Friends of Aseema

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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 2020 alone, the Moez & Marissa Kassam Foundation donated over half a 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 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

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Development Consultant Inquiries: HarvestMoonCannabisCo@gmail.com.” It is well known in the Canadian investment industry that “Betting Bruiser” is Robert.

17. 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.

18. 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.

19. The Defendant Jacob Doxtator (“**Jacob**”) is the cousin of Robert. He also resides in Belleville, Ontario. He operates 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.

20. 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.

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21. 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

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

23. 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 because they knew 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.

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24. In the Conspiracy, 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**”); 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; sending targeted communications containing the Unlawful Statements via email; and attempting to improperly attract regulatory and 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.

25. 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 (which provides market news and analysis regarding companies with small market

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capitalizations, as well as message boards for users to discuss securities issuers). 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 anonymously wrote, published and disseminated a lengthy Internet post containing Unlawful Statements about the Plaintiffs (the “**Defamatory Manifesto**”) on a series of websites. 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;
- (d) 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;
- (e) 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 their involvement. A version of the Defamatory Manifesto remains available on the Internet;

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- (f) 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;
- (g) the Defendants, similarly concealing their identities through alter-egos 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;
- (h) 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;
- (i) the Defendants published further false, defamatory, harassing, and malicious Unlawful Statements against the Plaintiffs through targeted emails sent from an anonymized email address;
- (j) 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; and
- (k) the Defendants attempted to draw the Defamatory Manifesto to the attention of regulators and, based on the Unlawful Statements, encouraged

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unwarranted regulatory scrutiny and investigation of the Plaintiffs, with the aim of disrupting and damaging the Plaintiffs' business and further harming their reputations.

26. As a result of the Defendants' conduct, the Unlawful Statements have been publicized broadly on the Internet, on various websites and online message boards and on Twitter. They have been disseminated widely, causing unwarranted adverse publicity for Anson that has significantly disrupted and damaged its business.

27. The Defendants have the means to attack Anson through the Conspiracy and may be motivated by an animus against Anson because of its scrutiny of overvalued stocks and pump-and-dump schemes, some of which the Defendants may have stood to benefit from. 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.

28. 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 extended beyond the company's fundamental value. Some of these cannabis companies were referred to in the Unlawful Statements.

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29. 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 are down 70% or more since their peak.

30. Moreover, the Defendant Robert 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.

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

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D. THE DEFENDANTS' CONSPIRACY AGAINST THE PLAINTIFFS

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

32. Anson and Kassam first met Robert in late August 2018, where they discussed the prospect of him providing consulting services to Anson via the company founded, Harvest Moon Cannabis Company. In the following months, Robert shared limited due diligence with Anson, but Anson ultimately decided not to engage him further.

33. Sunny Puri ("**Puri**") is a Principal and Portfolio manager at Anson, where he has worked since 2013. Robert has a particular longstanding malevolent animus towards Puri, which includes threatening violence.

34. In the months after August 2018, Robert became irrationally angry with Anson, and Puri in particular, because Robert thought – incorrectly – that Anson had traded profitably on the limited due diligence he provided and shared the 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".

35. In or around August 2019, Anson offered to pay a sum commensurate with other limited due diligence Robert provided. Robert took issue with the amount Anson had offered to pay him and began to threaten legal action, as well as physical violence and other retribution.

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36. 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

37. 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.

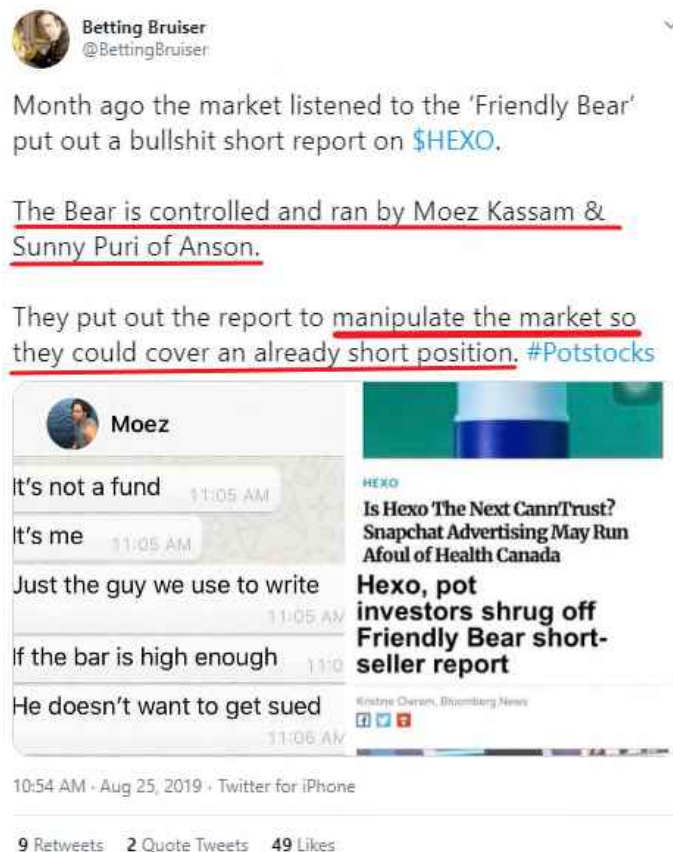
(ii) In Summer 2019, Robert launches a Campaign to spread Unlawful Statements about the Plaintiffs

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

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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):



As described above, publication of public company analysis is a routine feature of the capital markets. Anson and other market participants

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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:



- (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 negatively influence the company’s business decisions and reduce its share price:

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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

- (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):



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

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39. 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”.

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

40. 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 and dated July 23, August 14, August 17, and August 28, 2020 (collectively, the “**Unlawful Stockhouse Statements**”).

The July 23, 2020 Stockhouse Post

41. The 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” (the “**July 23 Stockhouse Post**”):



42. 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.

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43. 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.

44. 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.

45. The July 23 Stockhouse Post also falsely stated that Anson was “again caught naked” in relation to another company, Facedrive Inc. (“**Facedrive**”), falsely implying that Anson’s conduct was abusive or illegal and asking the Investment Industry Regulatory Organization of Canada (“**IIROC**”) if it would be investigating “how Moez creates paper”. Anson does not engage in naked short selling.

46. 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.”

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47. 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.”

48. 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.

49. Shortly after the publication of the July 23 Stockhouse Post, “John Murphy” issued tweets predicting more publications about Plaintiffs would soon “come out.” For example:

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50. “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.

The August 14, 2020 Stockhouse Post

51. 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” (the “**August 14 Stockhouse Post**”):



52. This post made similar allegations to the July 23 Stockhouse Post.

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53. 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”.

54. 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.

55. Also on August 14, 2020, “John Murphy” retweeted the false claim that Anson was behind the report produced by Hindenburg Research (“**Hindenburg Report**”) regarding Aphria Inc. (“**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:

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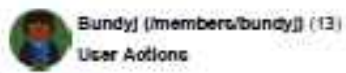
56. The same day, “John Murphy” tweeted additional allegations:

\$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

The August 17, 2020 Stockhouse Post

57. 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” (the “**August 17 Stockhouse Post**”):

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August 17, 2020 - 04:19 PM
1509 Reads
Post# 31419651

58. 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.”

59. 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.**”

60. The August 17 Stockhouse Post falsely stated that the Plaintiffs commissioned the 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”.

61. The August 17 Stockhouse Post also falsely claimed that, shortly before the 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.”

62. The August 17 Stockhouse Post implied Anson’s conduct violated securities regulations by encouraging regulators to investigate the allegations it contained. It

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concluded by encouraging readers to “[c]opy and share as I’m sure Moez will try to have this post removed.”

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

64. 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”.

The August 28, 2020 Stockhouse Post

65. 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” (the “**August 28 Stockhouse Post**”):

Moez Kassam and Anson at it again – you guys got off lightly
(/companies/bullboard/v.fd/facedrive-inc?postid=31470222)



stocknsyrup (/members/stocknsyrup) (1) | August 28, 2020 12:43 pm

66. 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

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of things that were hugely detrimental to the company and geared towards its destruction”.

67. 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!”.

68. 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.

(iv) After the Plaintiffs expend resources to remove the Unlawful Stockhouse Statements, the Defendants conspire to expand the Conspiracy’s online attack

69. 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.

70. 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. Then they took to other means to broadly

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disseminate the Unlawful Statements as part of their concerted and coordinated effort to defame the Plaintiffs.

71. On September 10, 2020, “John Murphy” tweeted 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

72. 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

73. On or around September 27, 2020, the Defamatory Manifesto – a 20-page rant 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”. Robert, Jacob and the Unknown Defendants wrote, contributed to, provided material for, and/or publicized and disseminated the Defamatory Manifesto, as set out below.

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74. 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.

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

75. 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.

76. Although the Defamatory Manifesto was published anonymously, it references many precise topics that the Doxtators had previously tweeted false claims about.

77. 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

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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.

78. 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.”***

79. 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.”

80. 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.”

81. The Defamatory Manifesto gives the false impression that the Plaintiffs were already under regulatory investigation. Later modified versions of the Defamatory

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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.

82. 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.”

83. 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”.

84. While this allegation is false, Robert is one of the few individuals who has information about the relationship between Kassam and his best man.

85. 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”

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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.”

86. 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.”

87. 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.

88. The Defamatory Manifesto continues with respect to Aphria. It falsely accuses Kassam of being “the mastermind” behind the Hindenberg Report by using Puri – who it

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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 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.**”

89. 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.

90. 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

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precariouly into SEC waters—rode [Genius] all the way up and then shorted it all the way down—disgusting.”

91. The Defamatory Manifesto falsely accuses the Plaintiffs of engaging in a similar illegal scheme with Facedrive. 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.

92. As referenced above, “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.

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93. 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.

94. 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.

95. The Defamatory Manifesto encourages readers to share and re-publish it. It also solicits readers to provide additional material regarding Anson and Kassam for future posts. The Defendants created and provided email addresses, such as info@moezkassam.com, to which readers could confidentially send information and are threatening to take this information to regulators. Some correspondence with this email “tipline” was signed by “Robert”.

96. 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). To Anson’s knowledge, the other two parts have not yet been published. If they are, and they contain false, malicious and defamatory content similar to the Unlawful Statements already contained in the Defamatory Manifesto, they will cause further, irreparable damage to the Plaintiffs’ business and reputations.

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

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

98. 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; and
- (h) www.CapitalMarketCrimes.to.

99. When 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

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Defendants published on the Internet, regardless of any differences between published versions of the Defamatory Manifesto.

100. 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 Emir Hodzic, a freelance web developer based in Serajevo, Bosnia and Herzegovina, and potentially others, to 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.

101. Despite Anson's requests, the current web hosts of the Defamatory Manifesto on www.MarketCrimes.to and www.CapitalMarketCrimes.to have refused to remove it. These websites were accessible on the Internet until recently before the date of the Statement of Claim.

102. 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 containing web registrars, hosts, message boards to mitigate the harm.

103. After the Plaintiffs worked with website registrars to have the Defamatory Manifesto removed from the websites described in paragraphs 98(a) through 98(f), 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

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Manifesto removed, further defaming Anson. This is false: the websites were voluntarily taken down by the website hosts or registrars.

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

104. ***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.

105. 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”.

106. 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

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title “Urgent News Tip – Huge Hedge Fund Fraud in America and Canada’s Stock Markets”.

107. 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.

108. 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.

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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.

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

110. 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

111. On September 29, 2020, "Betting Bruiser" tweeted a link to the Defamatory Manifesto, commenting:



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112. 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:



113. 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]

114. 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

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

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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

116. 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

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

117. 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

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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.

118. 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.

119. 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.

120. 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

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Robert purportedly made of his private conversations with Kassam. These tweets 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?”

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121. 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.

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



123. 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.

124. 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

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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?"

125. On October 31, 2020, "Betting Bruiser" posted a tweet encouraging vandalism of Kassam's house:



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(ix) The Defamatory Manifesto was disseminated widely online

126. 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. 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.

127. 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.

128. For example, 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";

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- (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...”.

129. Messages sharing links to the Defamatory Manifesto also appeared on Stockhouse using similar language to the messages described above. Comments on Stockhouse 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

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hedge fund guy that has been running amok in the Canadian markets – crazy...”; 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”.

E. THE DEFENDANTS ARE LIABLE

130. 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, and defamation.

(i) The Defendants’ Tortious Conspiracy Against Anson

131. 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.

132. 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.

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133. 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

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

135. By making, assisting with, participating in and/or publicizing the Unlawful Statements, the Defendants gave publicity to very serious 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.

136. 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

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

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138. 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 accused Kassam, and by extension Anson, of unlawful, dishonest and criminal conduct. The Defendants intentionally harmed Anson through making Unlawful Statements about Kassam.

(iv) Appropriation of personality

139. 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.

140. 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) Defamation

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

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The Unlawful Stockhouse Statements are Defamatory

142. The Unlawful Stockhouse Statements (discussed above at paragraphs 40 to 68) 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.

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143. In addition to the meanings set out in paragraph 142, 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.

144. In addition to the meanings set out in paragraph 142, 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;

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- (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.

145. In addition to the meanings set out in paragraph 142, 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;

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- (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.

146. In addition to the meanings set out in paragraph 142, 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;

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- (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

147. The Defamatory Manifesto (discussed above at paragraphs 69 to 96) 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

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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, 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 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;

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- (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;

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- (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

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(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.

Robert Lee Doxtator's Defamatory Tweets

148. 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 38(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 38(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 38(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

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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 38(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 111, 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 above at paragraph 114, 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 120, 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 above at paragraph 124, on October 30, Robert published tweets alleging that Kassam is "running scared from recent reports about

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his tactics” and “the scum of the earth”, and that he has others do “his dirty work for him”.

149. 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.

150. 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.

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Jacob Doxtator's Defamatory Tweets

151. 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 above at paragraph 55, 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

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- 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 71, 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 paragraphs 72 and 113, 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

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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 above at paragraphs 112 and 116, 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.

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152. 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

153. As discussed above at paragraphs 106 to 109, 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.

154. 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.

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The Defendants were Malicious

155. 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 Defamatory Manifesto soliciting readers to confidentially provide additional material for future Defamatory Manifestos, and the Defendants' continuous efforts to draw the Unlawful Statements to the attention of regulators and the media.

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

157. The Defendants are also liable for republication of the Unlawful Statements, which was a natural and probable result of the Unlawful Statements. In fact, the Defendants actively encouraged re-publication of the Defamatory Manifesto, both in the text of the Defamatory Manifesto itself, and in Robert's and Jacob's tweets sharing the Defamatory Manifesto. Republications of the Defamatory Manifesto currently remain online.

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F. DAMAGES

158. 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. A version of the 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.

159. 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.

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

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

162. 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 removed from the Internet, the Defendants persist in acquiring new websites to publish and disseminate the Defamatory Manifesto, and in repeating the Unlawful Statements and publicizing the Defamatory Manifesto through social media, including Twitter. In addition, the Defendants continue to threaten the release of two

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additional “Parts”. This 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.

163. 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 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.

164. 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.

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

166. 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.

December 17, 2020

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Lawyers for the Plaintiffs

APPENDIX "A" – "Betting Bruiser" Tweets

 **Betting Bruiser**
@BettingBruiser

Month ago the market listened to the 'Friendly Bear' put out a bullshit short report on [\\$HEXO](#).

The Bear is controlled and ran by Moez Kassam & Sunny Puri of Anson.

They put out the report to manipulate the market so they could cover an already short position. [#Potstocks](#)

 **Moez**

It's not a fund 11:05 AM

It's me 11:05 AM

Just the guy we use to write 11:05 AM

If the bar is high enough 11:05 AM

He doesn't want to get sued 11:05 AM



HEXO



Is Hexo The Next CannTrust? Snapchat Advertising May Run Afoul of Health Canada

Hexo, pot investors shrug off Friendly Bear short-seller report

Kristine O'Leary, Bloomberg News

10:54 AM · Aug 25, 2019 · Twitter for iPhone


9 Retweets 2 Quote Tweets 49 Likes

 **Betting Bruiser** @BettingBruiser · Aug 25, 2019

Replying to @BettingBruiser

I'm going spend the next week exposing the Anson fund connections to other short sellers and market manipulators. Which [#Potstocks](#) has the fund has historically invested and the death spiral the fund created to cash out their short positions.

 **@LamboJohnny**

Just bumped into Moez head of
Anson Fund. He owns over 15% of

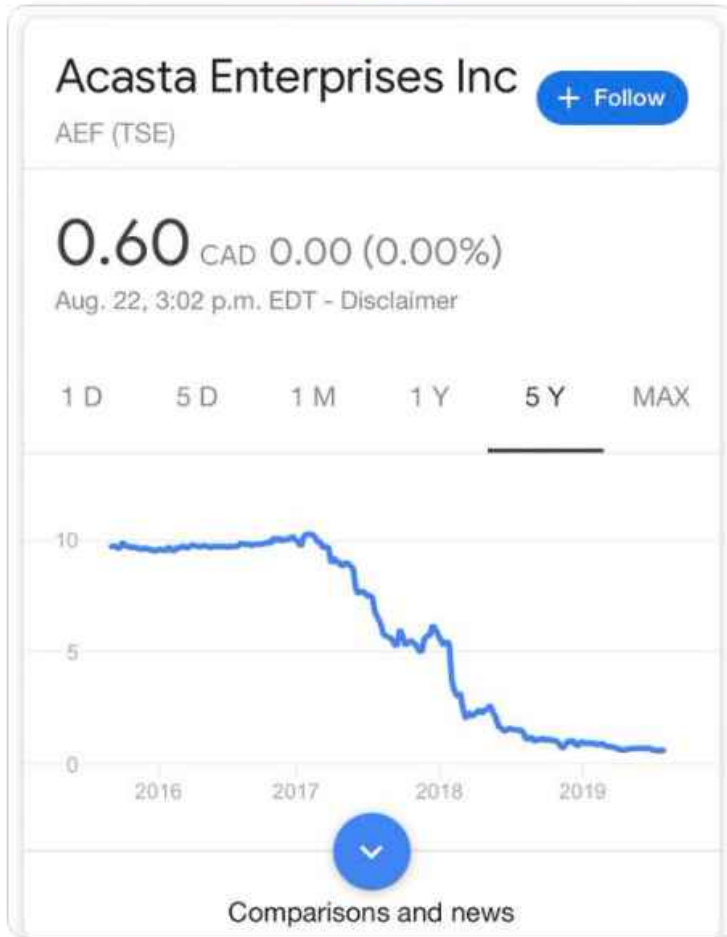




Betting Bruiser
@BettingBruiser

Replying to @BettingBruiser

It's always a similar result ... yet Anson Funds still makes money hand over fist... #Potstocks



4:00 PM · Aug 25, 2019 · Twitter for iPhone



Betting Bruiser
@BettingBruiser

...

Replying to @LamboJohnny and @LaurenceJeunes

Right about what? That's Anson doesn't appear on Sedi as insider. No they don't and that's part of the problem. In cases were they have former managers as "independent" directors how are they not insiders?

4:52 PM · Aug 25, 2019 · Twitter for iPhone



Betting Bruiser @BettingBruiser · Aug 25, 2019

▼

Hey @LamboJohnny if this is true ... why don't we see Anson Funds name come up as being escrowed on Sedi for owning more than 10%? I don't see Moez name either ... Anson not on any SEDI filing since 2016 for [\\$SOL](#) [#Potstocks](#) [twitter.com/LamboJohnny/st...](#)

This Tweet is unavailable.

6



14



Betting Bruiser @BettingBruiser · Aug 25, 2019

▼


Oh they have converts ... that they use to cover their short positions without suspecting retail investors ... creating any visible cover or tripping any insider trading reports... why not listed on Sedi? Cause they using the same convert scheme they use with everyone else!

1



4




**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

 3  1  15  

 **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

 2  2  20  

 **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 to 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

 3  1  18  

 **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

   14  

 **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

 1    

 **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



Betting Bruiser
@BettingBruiser

...

Replying to @BettingBruiser

Director, President and Co-Chief Executive Officer, Chief Financial Officer: Eli Dusenbury

A rent a CFO whoms main gig was a CFO of #PotStocks Company \$ISOL @isodiol. Ankther company directly involving Anson Funds. Another company which has seen a 98% fall in share price. 8/9

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



Betting Bruiser
@BettingBruiser

▼

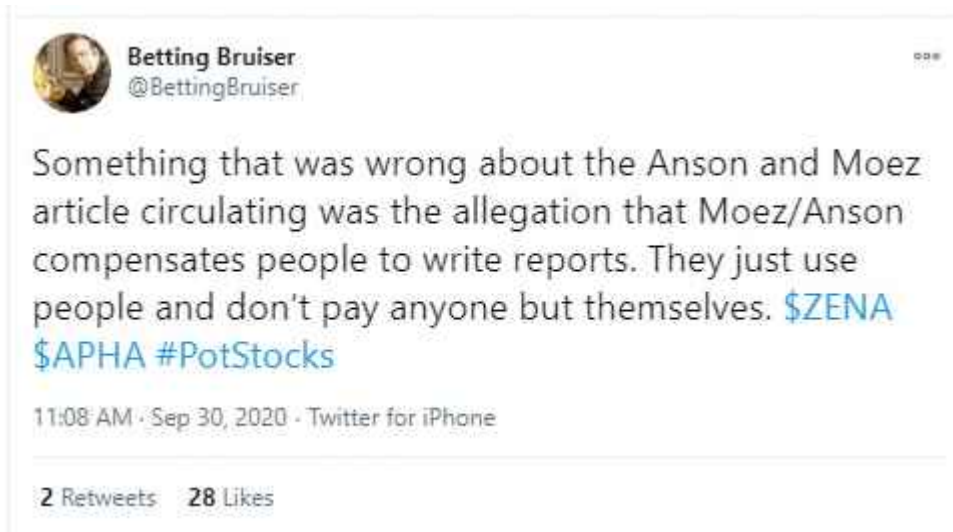
I have been a early voice of concern re: Moez Kassam, Sunni Puri & Anson Funds. Their tactics are simply sleight of hand with the gift of gab. I know their strategies very well this article shed some light on them. #PotStocks



Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure
moezkassam.com

9:43 AM · Sep 29, 2020 · Twitter for iPhone

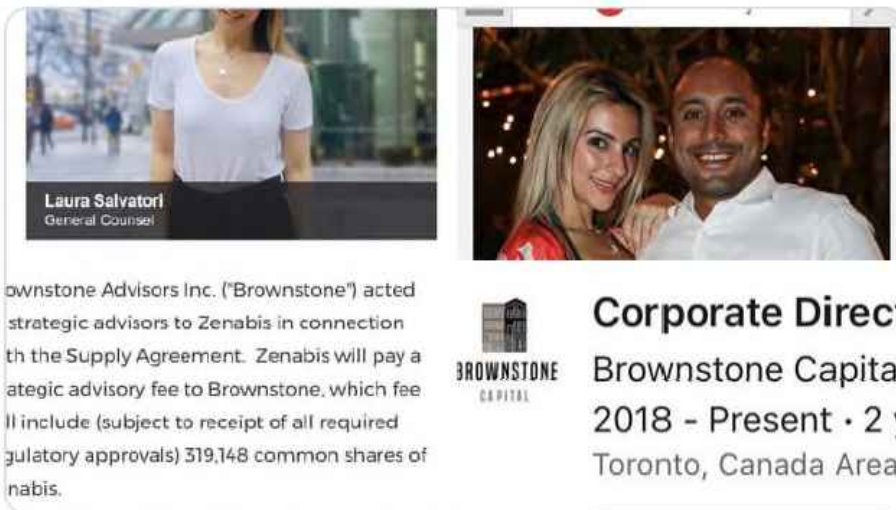
8 Retweets 2 Quote Tweets 63 Likes





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](#)



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](#)



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](#)





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



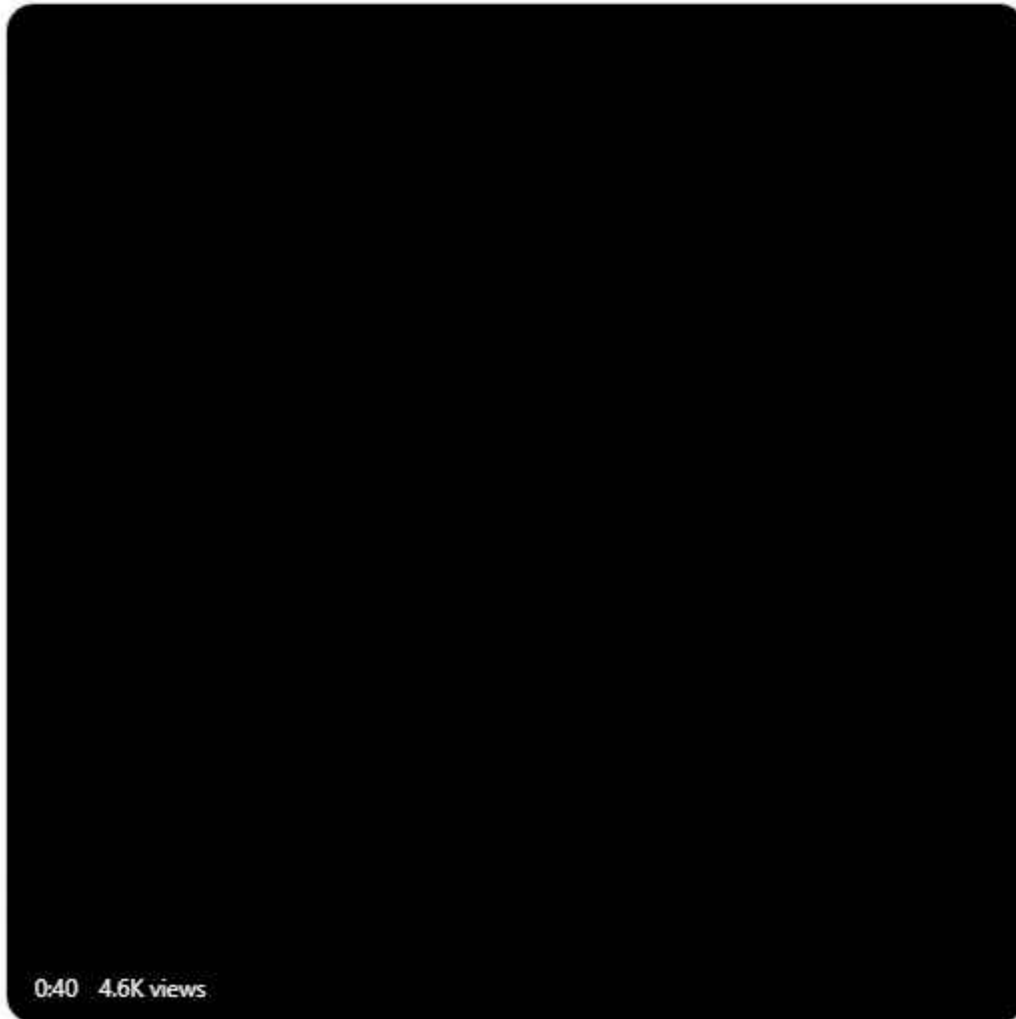
8:33 AM · Oct 16, 2020 · Twitter for iPhone



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

Replying to @BettingBruiser

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 Axler ... is it the fact your Moez Kassam lapdog?



10:55 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

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



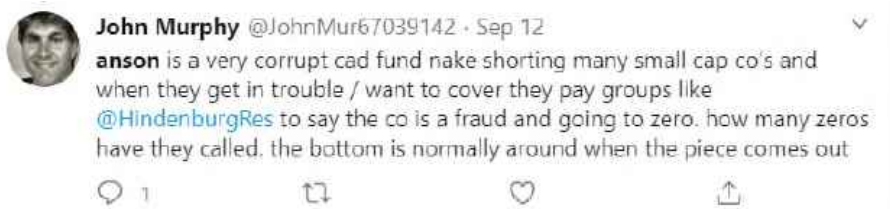
MDeCicco @MDeCicco_ · Aug 14

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

Capital Market Crimes – Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure.
[@LamboJohnny](#) [@BettingBruiser](#) [@globeandmail](#)
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[vc_row][vc_column][vc_empty_space height="20px"]
[vc_column][vc_column offset="vc_hidden-xs"]...
[moezkassam.com](#)

3:47 PM · Sep 27, 2020 · Twitter for iPhone

4 Retweets 15 Likes

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.... [#viiicapital](#)
[@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](#) [\\$td](#) [\\$gfi](#) [\\$shrm](#) many more

3 Retweets 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 #traderTony from Bcapital. 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.





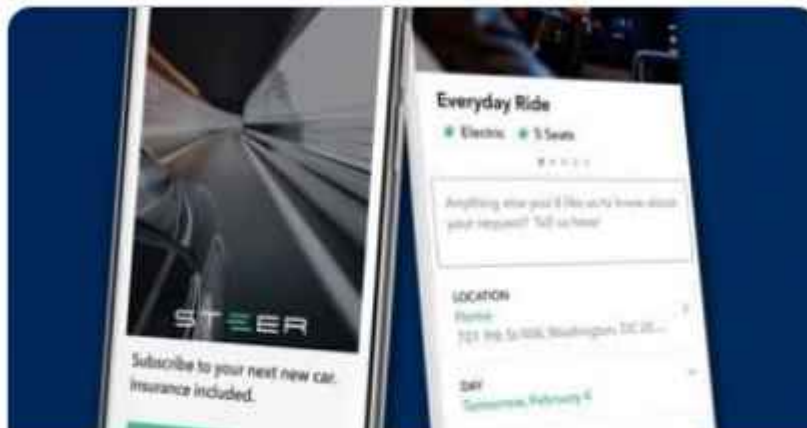
John Murphy @JohnMur67039142 · Sep 30

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...
@QTRResearch @BettingBruiser @LamboJohnny @weedstreet420
@davidmilstead



John Murphy @JohnMur67039142 · Oct 28

[SFD Facedrive](#) target of an ongoing short attack by @AnsonGroupFunds
how will this play out? @QTRResearch @BettingBruiser @weedstreet420
@ddale8 @BNNBloomberg @DisruptorsBNN



Blackrock, Bezos And Musk Charging Ahead in this \$30 Trillion Mega-Tr...
In the last two years there has been a 733% increase in ESG investments
while tech companies have soared, now there is one new industry playe...
finance.yahoo.com







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

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.

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

Proceeding commenced at Toronto

STATEMENT OF CLAIM

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Barristers & Solicitors

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Fax: 416-863-2653

christopher.dimatteo@blakes.com

Lawyers for the Plaintiffs

This is Exhibit "B" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

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July 23, 2020 - 10:11 AM
1049 Reads
Post# 31307009

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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Alternate Symbol(s): ACB (/companies/quote?symbol=acb)

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Drug Manufacturers - Major (/news/trending/drug-manufacturers-major_122)

Cannabis (/news/trending/cannabis_69303)

Aurora Cannabis, headquartered in Edmonton, Canada, cultivates and sells medicinal and recreational cannabis through a portfolio of brands that include Aurora, CanniMed, Daily Special, MedReleaf, and San Rafael '71. Although the company primarily operates in Canada, Aurora has expanded internationally through medical cannabis exporting agreements or cultivation facilities in more than 25 countries.

\$ 12.87 0.43 | 3.46% Bid: 12.87 x 7300 Ask: 12.89 x 600 Volume: 1,402,202
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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 groveling 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.

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replyto=31409659&threadid=31409659&source=bullboard)

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Innovation to Win



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Alternate Symbol(s): APHA (/companies/quote?symbol=apha)

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Aphria, which is headquartered in Ontario, produces and sells medicinal and recreational cannabis. The company operates through retail and wholesale channels in Canada and internationally. Aphria is a main distributor of medical cannabis to Germany and has operations in over 10 countries outside of Canada. However, it does not currently operate in the U.S. due to federal prohibition. The company is focusing on expanding through international cultivation and distribution into the global medical c

\$ 6.03 -0.01 -0.17% Bid: 6.02 x 14600 Ask: 6.03 x 1900 Volume: 676,692
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Aphria Inc. (/companies/bullboard/t.apha/aphria-inc) > The Real story on what happened with Moez Kassam and Aphria

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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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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 don'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-balling won't work much longer.

Copy and share as I'm sure Moez will try to have this post removed.



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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.

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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, MSV 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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what a crazy tale. So do you realize that face drive is a complete scam and will likely go to pennies soon and it will have nothing to do with moez and all to do with this companies shady practices

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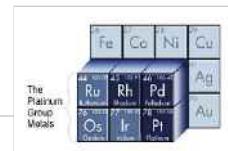
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Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

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Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure

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October 3, 2020

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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. [Click here to read their release.](#) Do not be silent – help them clean up the capital markets

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. We don't know how long this site will be up as Anson Funds keep on bringing them down via DDOS attacks. They are desperate this report isn't read. If you have any information on Moez Kassam and Anson Funds please send to info@capitalmarketcrimes.org 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.

Let's take a look at Moez Kassam's recent deals, delving deep inside his criminal 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.



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 Isodiol, by acting as a privately held alternative asset manager and advisor to both companies.

So, Anson Funds served as the lead investor for funding Zenabis in the early rounds, 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

Zenabis

 <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 Greve 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 Modelbouw 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 acel48, 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 OHCAP Management Partners, and in the investment banking group of Citigroup Global Markets 	 <p>Natalasha Kieman 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

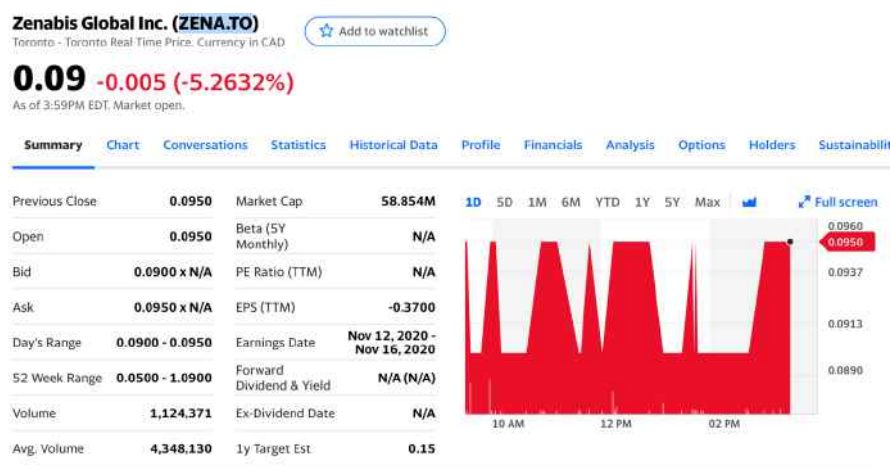
Taking orders from Kassam, Adam Spears convinced Zenabis executives to make their founder shares available to Anson Funds via non-public share loan agreements. Zenabis agreed, including Mark Catroppa, Manoj (Monty) Sikka and CEO Rick Brar.

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.

Spears and Kassam somehow managed to convince Brar to go public at the highest 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.

“Whenever Adam had news from his director’s chair at Zenabis, he would walk over and 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.

Grieve might have been the new CEO, but he wasn’t in control. Anson Funds and Kassam 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 Information
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 Proposed Supply Agreement between Zenabis and High Park. High Park seeks approximately CAD \$24 million, as well as additional unspecified damages and related commercial 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 the fund additional flexibility to keep these sort of trades onside.

According to 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.

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 wrongdoing in the process.

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@capitalmarketcrimes.org

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 certain 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 Dostoyevsky'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.

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.

Right before the Hindenburg report was released, Kassam's Anson Funds went short Aphria (a good investigation of their various funds and off-book structures 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.

According to sources close to Kassam's dealings, the morning the Hindenburg report came out Moez was calling all the banks, brokerages, and everyone with a serious position to tell them the stock would never open again as it was under investigation by the fraud squad and a host of other lies that he knew could cause serious damage.

But this story got out of control, and Kassam realized he had let the stock fall too far. In response, he started buying, with help from Andrew Left of Citron Research, yet another murky player in this very murky short-selling world. Kassam engaged Left to write a positive research report on Aphria this time.

Sources in Kassam's circle directly witnessed him telling people that he had used his relationship with Andrew Left 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.

When Left's report was released, Aphria stock jumped and Kassam made another pile of money and earned major gratitude from the Aphria management.

But he was playing both sides here and Aphria was blind to it.

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 certainly won't let it happen again, but there are other victims, and regulators are sleeping at the wheel and letting this cancer erode investor confidence in the capital markets.

The Failed Tilray Short – Where It All Started Going Wrong

Kassam tried to short Canadian cannabis darling Tilray in 2018. That was the real 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 groveling 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 fact, TD Bank has been helping Moez a lot recently – especially when it comes to spoofing the markets – but more on that soon.)

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.

Rumors are that Kassam lost around \$80 million on this dodgy short strategy. But he didn't get caught. He got burned, and that's even worse for an ego like his.

The first stop on his desperate road to recovery was Zenabis.

The second stop was Genius Brands

Genius Brands International: Illegal Pump and Dump

Anson Funds was the driving force behind the manipulative long-short campaign for entertainment company Genius Brands – GNUS.

Rumors 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.**

As Anson Funds prides itself as being a short fund that preys on unsuspecting companies, GNUS prides itself on creating kid-friendly entertainment content. And in the kid-friendly entertainment world, there is nothing bigger than Disney. The best way that Anson could exemplify an exciting GNUS investment thesis was to associate it to Disney.

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.

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@capitalmarketcrimes.org

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 reality, however, is that they had a direct hand in both.

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.

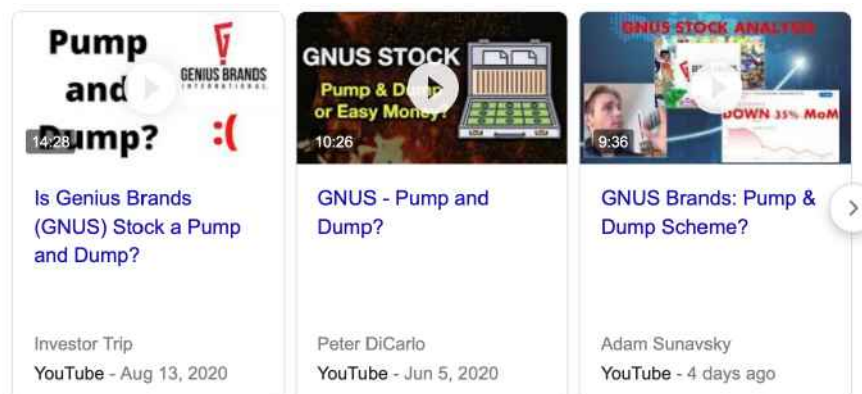
They are all members of a short-selling group that has become known since the [Catalyst Capital lawsuit](#) as the "Wolfpack Conspirators".

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.

The timing of the release of the report was impeccable. It was also put together, complete with an ostensible investigation, in a matter of a few days. That sort of turnaround time, of course, is impossible, so it is clear that Nate Anderson was given vital facts of vetted information by an insider (in this case Moez Kassam).

That marked the beginning of the end of the GNUS pump campaign.



But there are more details of the Hindenburg report that are worth mentioning here. The report was premised 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.

As large investors and trusted advisors of GNUS, Moez Kassam, Sunny Puri and/or Adam Spears gave management the impression there could actually be a strong value proposition in Genius Brands' stock.

They managed to convince GNUS (desperate after 10 years of losses) that they were in it for the long haul. Totally dedicated. This got them inside the company and privy to management's most intimate insider details. Those details were likely protected by a Non-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 Cartoon 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.

While Nate Anderson is unlikely to have been compensated directly by Anson Funds for authoring the report. Many loyal investors will question why Hindenburg Research would risk tarnishing its reputation as an activist short seller by working with Anson Funds. Outside of the promise that Anson Funds will continue working with Hindenburg Research. 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. As was the case 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 since been removed from the blog post, presumably at the request of Disney or Anson covering their tracks.



The result of this fake news was that the stock shot up to \$8 USD. And then, strangely enough, the fake report simply disappeared. But nothing truly disappears on the internet... and digital forensics experts are now working to piece the entire fake news fraud trail together.

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 considering the stock price run up on GNUS and the fact that a street savvy Moez Kassam wouldn't take profits for his investors.

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 rumored 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.



Moez was desperate and is rumored to have 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. (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.)

What was the story Moez Kassam told his bankers—CIBC, TD, RBC, Fidelity, Canaccord, 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".

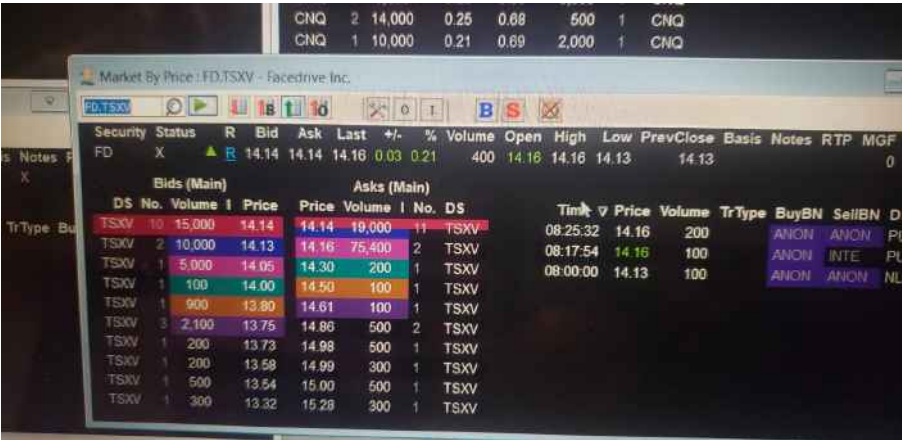
Facedrive and its shareholders should now be prepared for another assault out of desperation, as well as comments and "reports" by "The Friendly Bear" (AKA Moez and Sunny) and Andrew Left of Citron Research and their friend on Reddit: u/mnkaTHEkid. He's desperately trying to drive this stock lower as 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 pulled as a favor to Kassam. Further digging will likely establish a pattern of the same over 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 its 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.

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: marketinvestigations@protonmail.com

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

Regulators should note that while Moez Kassam is usually a high-functioning sociopath, at 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 would, for instance, have 50,000 shares and go short 500,000 but mark it as a net long 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 behavior. 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.

Insider Placement

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.

How does this work, exactly? Winston often sends emails and Whatsapp messages both 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 of

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.

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](#).

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.

Now he's back at it and letting rip with his network on Facedrive.

Before the Hindenburg report came out, Kassam had been attacking the stock for some time via social media. He pays stooges on Yahoo, Stockhouse, Stocktwits, Reddit, Twitter and other platforms to spread his lies. Some of his stooges have been identified, including JT, JDT, Surprise Sun and others.

You can even see JDT/JT on Twitter commenting on Hindenburg's thread. Now for a bystander with no skin in the game as he claims – he definitely goes to great lengths to bring a stock down.

You can find JDT on Stockhouse as well (regulators – we are doing your job for you, again). All of these sites track e-mails and IP addresses and if you get someone involved who really knows their thing you can get through the cloaking VPN's these guys are surely using.

Then, on Stockhouse, we have *Edwardoboo79* (Probably JDT) and JDT again. Similarly on Stocktwits we have *Edwardoboo79* again promoting various Reddit threads of yet more paid bashers:
<https://www.reddit.com/user/Skogan89/>

And this is really the tip of the iceberg. On their own it does very little but when combined they can cause significant damage to a stock and its shareholders. So, if your company comes under attack – check these places – you will see the language syntax is the same across the board for all of these people. Again this is something Anson have been punished for in the past but Moez believes himself above others and the law and just carries on.

What Comes Next?

High-level Canadian trading sources say there is a new bill being put forward to stop naked short selling in Canada for anyone involved in broker deals. And more than that, the bottom-feeding tactics of Moez Kassam are the bill's primary inspiration as he and his cronies are giving Canadian capital markets a bad reputation.

That means that Moez Kassam is already pinging regulatory radar quite loudly.

But it won't just be Canadian regulators that Kassam has to worry about. Dirty deals in the U.S. are going to haunt him, as well—and the SEC has razor-sharp teeth. Once this investigation is over, they'll be hovering around Kassam's base of operations in Dallas, 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 behavior 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@capitalmarketcrimes.org – **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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This is Exhibit "E" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.


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Bluma Wellness Inc. BMWLF

Primary Symbol: C.BWELU

Healthcare
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Bluma Wellness Inc is engaged in the manufacture, possession, use, sale and distribution of medical cannabis in the State of Florida. The company owns and operates a vertically-integrated, licensed medical cannabis company in the State of Florida doing business as One Plant Florida. One Plant Florida cultivates, processes, dispenses and retails medical cannabis to qualified patients in the State of Florida through multiple retail dispensaries and an next-day door-to-door e-commerce home delivery

\$1.06 ↓ -0.05 -4.50%
Bid: 1.04 x 100
Ask: 1.16 x 100
Volume: 214,450


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October 01, 2020 - 12:03 PM

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A big scandal might be unfolding in Canadian markets


Interesting investigative piece looking at a short selling group that have scammed investors out of billions. The original site has been DDOS attacked but you can read the report they don't want you to read here: <https://archive.st/archive/2020/9/stockmanipulators.com/v3ix/stockmanipulators.com/moez-kassam-and-anon-funds-a-tale-of-corruption-greed-and-failure/index.html>
 And here (this one is a bit slow but it does load): <https://web.archive.org/web/20200928200023/https://stockmanipulators.com/moez-kassam-and-anon-funds-a-tale-of-corruption-greed-and-failure/>

This is Exhibit "F" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
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Expires January 28, 2023.



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EXXON MOBIL CORPORATION XOM.32

Primary Symbol: **XOM** Alternate Symbol(s): **XOM.24B** | **XOM.26** | **XOM.38A**


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Looks like the Moez Kassam Report is back up

Investigative report looks at 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.

Report is here: <https://marketcrimes.to/2020/09/28/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

The rumors are a second report is coming soon that is even more explosive. They have a tip line as well, so anyone with information might want to send something in.

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March 07, 2021 - 12:53 PM

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Canadian Hedge Fund Under SEC Investigation

We all know Anson Funds – the group run by the criminal Moez Kassam (<http://marketfrauds.to/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>)

Well something we have just found out from a number of senior members within Anson itself is that they are under SEC investigation. They have been for some time as they received their first letter some time ago. But what has got them really spooked is the second letter that came from the SEC. This is apparently a BAD one. Wire Fraud, Insider Trading, possible money laundering – a host of issues the regulator has with them. And this is the SEC!

It was so scary that one of their senior employees in Anson Dallas, Ali Zamani – resigned. He knows a lot about their illegal activities in the United States and thought the risk of staying with Anson was just too high.

Now what I'm wondering is have their current unitholders been made aware of this? Have new investors been made aware of this investigation?

Anson Funds is falling apart with staff morale at an all time low. Moez Kassam hasn't been in the office in 4 months now as he is afraid that he will be arrested on return to Canada, and the rest of the staff led by the escort lover Sunny Puri just aren't up to the task and are berated daily by Moez (or whenever he can be bothered to call in). Now who runs a hedge fund during a volatile period in the markets and doesn't show up to work?

No one. It might have something to do with the funds 20% realized loss they took in January. I don't know but if I was a unitholder I would have a lot of questions for Moez and Anson, especially around the SEC. Moez has a leak problem within Anson. He has employees phones monitored and all of their activities checked and they all have the threat of \$100 million lawsuits against them.

But Moez people do not thrive in an atmosphere of fear and threats. Resentment and anger builds and now many of your people have broken ranks – they are spilling the beans on your criminal enterprise. The SEC info was supposed to be only known by a tight group, but your people can't help talking Moez. It's because deep in their souls they know you for what you are, and they want the truth to get out. People are no longer scared of you. You have hurt hundreds of companies and thousands of people with your bullying, hit pieces, social media bashing and outright lies. You have cost thousands of jobs and stolen billions of Dollars from retail investors. The bill for your multitude of crimes is coming due very soon. And a light will be shone on the banks who have facilitated your criminal behavior (TD, RBC, CIBC and Scotia) – Scotia why do you never learn.

I think the next few months will be very revealing as the veil around Anson Funds is drawn back. Much more on this to come. I also wanted to add a note to Anson employees. This is the beginning of the end for criminal employers. You have a small window to go the authorities with what you know.

Forget the lawsuits Anson have threatened you with - they are nonsense. You have whistleblower protection. Use this.

If you won't do it because it's the right thing. Then do it to protect your asses. This is a govt agency with will and real political juice. It will not be swept under the carpet like Moez is claiming and just because you aren't running the show doesn't mean the authorities won't come after you with the full power of the law. Here is an archived version of the first report as well <https://archive.is/tQTMz>

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March 07, 2021 - 02:57 PM

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Canadian Hedge Fund Under SEC Investigation

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Expires January 28, 2023.



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March 18, 2021

VIA EMAIL

Gary Kelly
 Stockhouse Publishing Ltd.
 1185 West Georgia Street, Suite 1625
 Vancouver, British Columbia V6E 4E6
 Canada

Gary.Kelly@stockhouse.com

RE: Abusive Content about Anson Funds on Stockhouse

Dear Mr. Kelly:

We are counsel to Anson Funds, a prominent Canadian hedge fund ("**Anson**"), and one of its principals, Moez Kassam ("**Kassam**"). Our clients are the victims of a coordinated campaign whereby anonymous individuals are systematically and repeatedly abusing the Stockhouse website, among other forums, to publish illegal, false, defamatory, malicious and harassing material about them. We are writing on their behalf to request your cooperation to address this situation and prevent further prejudice to our clients now, and in the future.

As you are aware, in July and August 2020, an anonymous user or users published a series of false and defamatory posts about our clients on Stockhouse. Stockhouse cooperated and removed the posts in question for violating the terms and conditions of Stockhouse's website (the "**Terms and Conditions**"). These posts from summer 2020, as well as other false and defamatory content published about our clients, are currently the subject of litigation in the Ontario Superior Court of Justice, Commercial List.

Since summer 2020, the conspirators seeking to harm our clients have continued to publish abusive, harassing and defamatory posts on Stockhouse regarding Anson, Kassam, and another Anson employee, Sunny Puri (the "**Abusive Posts**"). Between September 27, 2020 and March 8, 2021, **over 1,000 Abusive Posts** were published on Stockhouse. The Abusive Posts make serious, baseless allegations, including false accusations of illegal conduct and false allegations that our clients are the subject of regulatory investigation.

The Abusive Posts appear to be published using "burner" Stockhouse accounts created for the purpose of targeting Anson, Kassam and Puri. Many of these accounts have made no other posts besides the Abusive Posts, and are therefore not contributing to the Stockhouse community in any meaningful way. The Abusive Posts appear on message boards about well-known publicly traded companies including General Electric Company, Wells Fargo, Coca Cola, Morgan Stanley, Mastercard, Aphria, Tilray, and

24085584.6



Paypal, clearly designed to draw the maximum attention to them and cause the most harm to our clients, while also damaging the integrity of the Stockhouse platform. However, based upon review of the Abusive Posts, they are wholly unrelated to the message boards on which they are published. Further, and relatedly, Stockhouse users have expressed their frustration about the Abusive Posts (e.g., in response to one Post, a Stockhouse user wrote “who cares?”).

Anson has thoroughly investigated the Abusive Posts published on Stockhouse since September 2020. A detailed summary of factual findings is provided in the attached Appendix.

The Abusive Posts serve no purpose other than to bully, harass and defame Anson and its employees. The Abusive Posts have been disseminated through social media, and much to Anson’s concern, the broader defamation campaign against Anson has resulted in its employees feeling physically threatened.

Moreover, the Abusive Posts clearly violate Stockhouse’s Terms and Conditions, as they are “false, misleading, unlawful...harmful, threatening, defamatory, libelous, abusive, inflammatory, harassing, vulgar, obscene, fraudulent, [and] invasive of privacy or publicity rights”. Stockhouse’s Terms and Conditions require it to take action, remove this illegal material from its website, and prevent similar content from being posted in the future. The Terms and Conditions state:

STOCKHOUSE NETWORK OF SITES PROHIBITED USER CONTENT AND CONDUCT

You will not and will not permit any third party to....

8. post on or through any of the Stockhouse Network of Sites, including without limitation any Site Content, Applications and/or Services, any of Your Information, including without limitation User Content...that is or that Stockhouse deems to be **false, misleading, unlawful, promoting unlawful or criminal activities, harmful, threatening, defamatory, libelous, infringing, abusive, inflammatory, harassing, vulgar, obscene, fraudulent, invasive of privacy or publicity rights**, sexually exploitative, hateful and/or racially, ethnically or otherwise objectionable....

[...]

REPEAT INFRINGER AND VIOLATOR POLICY

Stockhouse may also, in appropriate circumstances and at its sole discretion:

1. terminate or suspend your membership; and/or

2. limit your access to and/or use of any of the Stockhouse Network of Sites, including without limitation any Site Content, Applications and/or Services, in both cases if either

3. Stockhouse deems that you have infringed the copyright and other intellectual property rights of others, whether or not there is any repeat infringement; and/or



4. **Stockhouse deems that your conduct and/or User Content has violated this Agreement, whether or not there is any repeat violation.** [Emphasis added.]

Given Stockhouse's powers and responsibilities under the Terms and Conditions, our clients request that Stockhouse immediately:

1. Remove the Abusive Posts from the Stockhouse website in accordance with the Terms and Conditions, and consistent with your previous removal of the earlier Abusive Posts.
2. Terminate the Stockhouse membership of all users who published the Abusive Posts and permanently remove their access to the Stockhouse website. Our clients are clearly the target of concerted and coordinated defamation and harassment campaign ongoing since at least in summer 2020, and which is taking advantage of the Stockhouse forum and community. Simply deleting the Abusive Posts from the Stockhouse website leaves our clients vulnerable to the significant risk that additional defamatory material will be published in the future – as has, in fact, occurred.
3. Our clients would like to discuss what steps Stockhouse can take to prevent its platform from being used to publish additional abusive content in the future. For example, in addition to deleting the accounts of all users who published the Abusive Posts, the IP addresses used to disseminate the Abusive Posts should no longer be permitted to publish material on Stockhouse. Our clients are open to exploring what other actions Stockhouse can take in this regard, including continued support in banning IP addresses in the future should the problems discussed herein persist.
4. Proactively monitor future posts on Stockhouse to ensure that similar defamatory allegations are not published about our clients in the future.
5. Provide all information in Stockhouse's possession about the identities of the individuals who posted the Abusive Posts, including email addresses, IP addresses, and contact information.

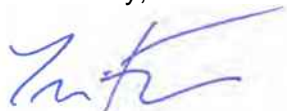
We trust that Stockhouse will cooperate with our clients to address this matter, as it has in the past, and promptly take the steps outlined above. These steps will also strengthen the Stockhouse platform, as they will help to eradicate content that is inconsistent with the objective of Stockhouse and that has been significantly diluting the type of information that *bona fide* users are interested in accessing.

If Stockhouse does not cooperate in providing the requested information, our clients will consider the legal remedies available to them to address the ongoing illegal campaign against them, including seeking a *Norwich* order compelling Stockhouse to disclose identifying information about the posters.



Given the urgency of this situation, the growing harm to our clients, and the history of the conspirators using Stockhouse to post harmful content, I look forward to hearing from you at your earliest convenience.

Yours truly,



Iris Fischer

c: *Chris DiMatteo/Kaley Pulfer, Blakes*
Stockhouse Feedback, Customer Service, Technical Support, Bullboards and General Inquiries
(support@stockhouse.com)



APPENDIX – SUMMARY OF FINDINGS REGARDING ABUSIVE POSTS

A. September 2020 – October 2020

Posts published between September 12 and October 7, 2020 targeted Anson and Moez Kassam. The headline tags included:

- Time's Up
- Expose on Moez Kassam
- Tale of Corruption
- These short sellers soured the entire cannabis market
- Check out this piece on short selling bandits in Canada
- A big scandal might be unfolding in Canadian markets

Many profiles were actively publishing Abusive Posts during this time, including:

- penismightier
- cool888
- thorgb1
- Findingmoney
- SandraZ
- ErikaGross
- Shooter300
- DrinkDrank1
- Bossman24
- Hardy4
- DeRoos

Many of these profiles were created shortly before the Abusive Posts were published, and clearly for the sole purpose of targeting Anson. It appears that an individual (or individuals) set up multiple fake accounts to systematically target Anson, Sunny Puri and Moez Kassam with malicious, damaging and unsubstantiated claims.

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Taking it to the Street.

Community Markets News Portfolio DealRoom

News Focus: Bragg Gaming to Graduate to the Toronto Stock Exchange (click to learn more)

Quote Bullboard News Opinion Profile Peers Filings Financials Options Price History

EXXON MOBIL CORPORATION XOM.32

Primary Symbol: **XOM** Alternate Symbol(s): **XOM.24B** | **XOM.25** | **XOM.39A**

Consumer Cyclical Energy Advertising Agencies

ExxonMobil is an integrated oil and gas company that explores for, produces, and refines oil around the world. In 2019, it produced 2.4 million barrels of liquids and 9.4 billion cubic feet of natural gas per day. At the end of 2019, reserves were 22.4 billion barrels of oil equivalent (including 3.8 billion for equity companies), 65% of which are liquids. The company is the world's largest refiner with a total global refining capacity of 4.7 million barrels of oil per day and one of the world's

[Add To Watchlist](#)

EXXON MOBIL CORPORATION > Looks like the Moez Kassam Report is back up

[New Post](#) [Older Post](#) [Newer Post](#) [View All Posts](#)

DrinkDrank1 (5) October 29, 2020 - 06:17 PM
[User Actions](#) 97 Reads
Post# 31810212

Looks like the Moez Kassam Report is back up

Investigative report looks at 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.

Report is here: <https://marketcrimes.to/2020/09/28/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

The rumors are a second report is coming soon that is even more explosive. They have a tip line as well, so anyone with information might want to send something in.

Screengrab - posted October 29, 2020

24085584.6

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[Quote](#)
[Bullboard](#)
[News](#)
[Opinion](#)
[Profile](#)
[Peers](#)
[Filings](#)
[Financials](#)
[Options](#)
[Price History](#)

Wallbridge Mining Company Ltd. T.WM

Alternate Symbol(s): **WLBMF**


Metals & Mining
Industrial Metals & Minerals

Wallbridge Mining Co Ltd is engaged in the acquisition, discovery, development, and production of metals focusing on gold, copper, nickel and platinum group metals. The company owns Sudbury Projects, Quebec Projects and Equity Investments. Wallbridge completed operations at its first polymetallic mine, producing copper, platinum, palladium, and gold from the Broken Hammer.

Add To Watchlist
Company Website

Wallbridge Mining Company Ltd. > Check out this piece on short selling bandits in Canada

New Post
« Older Post
Newer Post »
View All Posts


SandraZ (0)
September 30, 2020 - 12:46 PM
204 Reads
Post# 31642122

Check out this piece on short selling bandits in Canada

Interesting investigative piece looking at a short selling group that have scammed investors out of billions. It's a must read: <https://stockmanipulators.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

Reply
Quote | Follow
Report Abuse

Screengrab - posted September 30, 2020

24085584.6

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penismightier (59)
User Actions

September 27, 2020 - 07:54 PM
163 Reads
Post# 31627243

Time's Up

Story about everything we already know about the biggest dirtbag on Bay St.
<https://moezkassam.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

Screengrab - posted
September 27, 2020

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News Focus Tudor Gold Completes Initial Mineral Resource Estimate with 19.4 MOz AUEQ (l


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Bluma Wellness Inc. **BMWLF**

Primary Symbol: **G.BWEL.U**

Healthcare Drug Manufacturers - Major

Bluma Wellness Inc is engaged in the manufacture, possession, use, sale and distribution of medical cannabis in the State of Florida. The company owns and operates a vertically-integrated, licensed medical cannabis company in the State of Florida doing business as One Plant Florida. One Plant Florida cultivates, processes, dispenses and retails medical cannabis to qualified patients in the State of Florida through multiple retail dispensaries and an next-day door-to-door e-commerce home delivery

\$1.06  -0.05 | -4.50% Bid: 1.04 x 100 Ask: 1.16 x 100 Volume: 214,450

USD | OTC PINK | DELAYED PRICE | MARKET CLOSED | MARCH 10, 2021 3:57 PM EST


Add To Watchlist

Bluma Wellness Inc. > A big scandal might be unfolding in Canadian markets

New Post


« Older Post

Newer Post »

 View All Posts

0

Favorites



ErikaGross (2)
User Actions

October 01, 2020 - 12:03 PM
135 Reads
Post# 31649069

A big scandal might be unfolding in Canadian markets

Interesting investigative piece looking at a short selling group that have scammed investors out of billions. The original site has been DDOS attacked but you can read the report they don't want you to read here: <https://archive.st/archive/2020/9/stockmanipulators.com/v3lx/stockmanipulators.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/index.html>
And here (this one is a bit slow but it does load): <https://web.archive.org/web/20200928200023/https://stockmanipulators.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

Screengrab - posted
October 1, 2020

24085584.6

Blakes

B. March 1 – 4, 2021

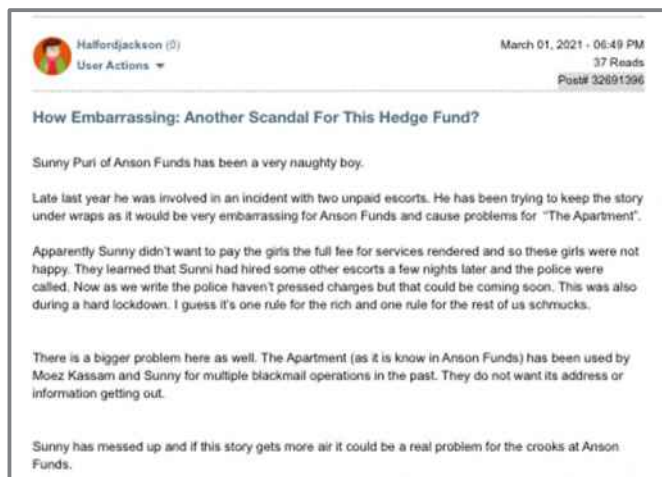
Abusive Posts published between March 1, 2021 and March 4, 2021 targeted Anson and Sunny Puri. The headline tags include:

- How embarrassing: Another scandal for this hedge fund: Sunny Puri of Anson Funds has been a very naughty boy.
- Looks like these guys are in trouble again: Sunny Puri of Anson Funds has been a very naughty boy.
- Notorious short selling fund in trouble: Sunny Puri of Anson Funds has been a very naughty boy.
- Sunny Puri wants to know the truth – here it is Sunny Puri.

It appears that four profiles were actively publishing Abusive Posts during this time. The profiles are:

- Halfordjackson
- FlowerDejeune
- KarimKa
- VonFurstenberg

Many of these profiles were created shortly before the Abusive Posts were published, and clearly for the sole purpose of targeting Anson. Again, it appears that an individual (or individuals) set up multiple fake accounts to systematically target Anson, Sunny Puri and Moez Kassam.




Screengrab - posted March 1, 2021



Screengrab - posted March 1, 2021

24085584.6

Blakes



FlowerDejeune (1)
 User Actions

March 02, 2021 - 12:57 PM
 87 Reads
 Post# 32695853

Notorious Short Selling Fund In Trouble


Sunny Puri of Anson Funds has been a very naughty boy.

Late last year he was involved in an incident with two unpaid escorts. He has been trying to keep the story under wraps as it would be very embarrassing for Anson Funds and cause problems for "The Apartment". Apparently Sunny didn't want to pay the girls the full fee for services rendered and so these girls were not happy. They learned that Sunni had hired some other escorts a few nights later and the police were called. Now as we write the police haven't pressed charges but that could be coming soon. This was also during a hard lockdown. I guess it's one rule for the rich and one rule for the rest of us schmucks.

There is a bigger problem here as well. The Apartment (as it is know in Anson Funds) has been used by Moez Kassam and Sunny for multiple blackmail operations in the past. They do not want its address or information getting out.

Sunny has messed up and if this story gets more air it could be a real problem for the crooks at Anson Funds.

Screengrab - posted March 2, 2021



KarimKa (5)
 User Actions

March 04, 2021 - 01:42 PM
 36 Reads
 Post# 32716568

Sunny Puri wants to know the truth - here it is Sunny Puri

Sunny Puri of Anson Funds is scratching his head trying to figure out who let the story out about him and his escort girlfriends.

You want to know Sunny? I know you won't believe me anyway if I do tell.

Okay you got me it was your boss, Moez Kassam. You see he was out drinking, BLIND DRUNK like he usually gets and he started talking (you know how he is). Wow did he have a lot to say about you and your colleagues. Apart from spilling the beans on your escapade he also mentioned how you and your colleagues are useless. He apparently does all of the work and you just leech off him. He is the only one committed to Anson Funds and everyone else just sits around. Anson employees don't even deserve the bonuses for all the crimes you have committed. He went on and on and on. Looks like he thinks someone in your office has a big mouth and has been blabbing about secret trades they shouldn't have and shouldn't even know about. You are one of the top suspects in his list. And he has all of your phones and workstations tapped and logged - he knows your every move.

The problem here is that he was so drunk he didn't notice that his outburst was being recorded alongside lots of other comments that regulators will love to hear. Just to make sure it's in the right hands we have sent it to the people who wrote the first report on Anson and it will hopefully be making an appearance whenever they release report 2.

Thank your boss Sunny. He has just gotten you into a lot of trouble (and even more when the recording comes out) How can you look in the mirror Sunny?

Screengrab - posted March 4, 2021

24085584.6

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C. March 7-8, 2021

Posts published between March 7, 2021 and March 8, 2021 targeted Anson and Moez Kassam, including false allegations of a regulatory investigation. The headline tags include:

- Canadian Hedge Fund Under SEC Investigation
- Anson Funds under SEC Investigation – Do Unitholders know?
- 100K Reward for info leading to conviction of Anson Funds

Many profiles that were actively publishing Abusive Posts during these dates.

Many of these profiles were created shortly before the Abusive Posts were published. Again, it appears that an individual (or individuals) set up multiple fake accounts to systematically target our clients.

The following table sets out information about the user profiles posting the Abusive Posts between March 1-8.

Profile	Date profile created	Date of post(s)
Halfordjackson	01-Mar-21	01-Mar-21
FlowerDejeune	01-Mar-21	02-Mar-21
VonFurstenberg	01-Mar-21	02-Mar-21
KarimKa	04-Mar-21	04-Mar-21
Benjamineraim	07-Mar-21	07-Mar-21
GordonGatsby	07-Mar-21	07-Mar-21
RodPirate	07-Mar-21	07-Mar-21
FabbyDebbie	07-Mar-21	07-Mar-21
Implications	07-Mar-21	07-Mar-21
Antid0te	07-Mar-21	07-Mar-21
Aladdin	07-Mar-21	07-Mar-21
KingJohn97	07-Mar-21	07-Mar-21
Frankmasterson	07-Mar-21	07-Mar-21
JohannaJenni	07-Mar-21	07-Mar-21
TheGrapeOne	21-Jun-20	07-Mar-21
SlapTheAskUni	10-Feb-21	08-Mar-21

Blakes

 RedPirate (15) User Actions March 07, 2021 - 02:57 PM 46 Reads Post# 32759662

Canadian Hedge Fund Under SEC Investigation

We all know Anson Funds – the group run by the criminal Moez Kassam (<http://marketfrauds.to/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>)

Well something we have just found out from a number of senior members within Anson itself is that they are under SEC investigation.

They have been for some time as they received their first letter some time ago. But what has got them really spooked is the second letter that came from the SEC. This is apparently a BAD one. Wire Fraud, Insider Trading, possible money laundering – a host of issues the regulator has with them. And this is the SEC!

It was so scary that one of their senior employees in Anson Dallas, Ali Zamani – resigned. He knows a lot about their illegal activities in the United States and thought the risk of staying with Anson was just too high.

Now what I'm wondering is have their current unitholders been made aware of this? Have new investors been made aware of this investigation?

Anson Funds is falling apart with staff morale at an all time low. Moez Kassam hasn't been in the office in 4 months now as he is afraid that he will be arrested on return to Canada, and the rest of the staff led by the escort lover Sunny Puri just aren't up to the task and are berated daily by Moez (or whenever he can be bothered to call in). Now who runs a hedge fund during a volatile period in the markets and doesn't show up to work?

No one. It might have something to do with the funds 20% realized loss they took in January. I don't know but if I was a unitholder, I would have a lot of questions for Moez and Anson, especially around the SEC.

Moez has a leak problem within Anson. He has employees' phones monitored and all of their activities checked and they all have the threat of \$100 million lawsuits against them.

But Moez, people do not thrive in an atmosphere of fear and threats. Resentment and anger builds and now many of your people have broken ranks – they are spilling the beans on your criminal enterprise. The SEC info was supposed to be only known by a tight group, but your people can't help talking Moez.

It's because deep in their souls they know you for what you are, and they want the truth to get out. People are no longer scared of you. You have hurt hundreds of companies and thousands of people with your bullying, hit pieces, social media bashing and outright lies.

You have cost thousands of jobs and stolen billions of Dollars from retail investors. The bill for your multitude of crimes is coming due very soon. And a light will be shone on the banks who have facilitated your criminal behavior (TD, RBC, CIBC and Scotia) – Scotia why do you never learn.

I think the next few months will be very revealing as the veil around Anson Funds is drawn back. Much more on this to come. I also wanted to add a note to Anson employees. This is the beginning of the end for criminal employers. You have a small window to go the authorities with what you know.

Forget the lawsuits Anson have threatened you with – they are nonsense. You have whistleblower protection. Use this.

If you won't do it because it's the right thing. Then do it to protect your asses.

This is a govt agency with will and real political juice. It will not be swept under the carpet like Moez is claiming and just because you aren't running the show doesn't mean the authorities won't come after you with the full power of the law. Here is an archived version of the first report as well <https://archive.is/9QTMz>

Screengrab - posted March 7, 2021

 FahdyDebbie (8) User Actions March 07, 2021 - 12:53 PM 75 Reads Post# 32759910

Canadian Hedge Fund Under SEC Investigation

We all know Anson Funds – the group run by the criminal Moez Kassam (<http://marketfrauds.to/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>)

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Screengrab - posted March 7, 2021

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D. Other examples of Abusive Posts



DeRoan (17)
User Actions ▾

December 23, 2020 - 01:56 PM
78 Reads
Post# 32170619

Fund Behind Cormark Securities \$800k SEC fine was Anson Fund

As many have seen Cormark Securities just received a very small fine from the SEC: https://www.stockwatch.com/News/Item?bid=Z-U:*SEC-3009676&symbol=*SEC®ion=U

It turns out that the hedge fund behind all of this is Anson Funds run by Moez Kassam. Remember Moez from here: <http://archive.is/IQTMz>

As you can see from the article the SEC didn't mention the hedge fund behind these short sales as apparently Anson are still under investigation.

The SEC has targeted Anson and are working on charging them which usually leads to a settlement with a significant fine. Just as a reference, Scotia Bank was recently fined \$127.5 million for metal market manipulation.

A fine of this size would be the end of Anson Funds and Moez Kassam.

I imagine Cormark gave them everything they needed, the accounts, feeder funds, etc... So it will be easy for them to track street wide.

Hopefully the SEC will actually do something about this and look into the dozens of other companies Anson have done exactly the same thing on. Will the average investor ever see justice? I doubt it as the system is built to benefit market manipulators like Moez.

Hopefully they will also look at how he and Anson then manipulate the stocks as well via short reports, spoofing, social media manipulation, bullying and much more. The SEC have been gathering details and now are starting to act.

Given the current status of this litigation, the OSC is likely to also start to bring charges against Anson Funds and Moez Kassam.

Lets clean up the capital markets. More info on how Moez Kassam and Anson Funds work here: <http://archive.is/IQTMz>



DrinkDrank1 (4)
User Actions ▼

October 29, 2020 - 07:16 PM
34 Reads
Post# 31810385

Is this the end of Moez Kassam?

Investigative report looks at 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.

Report is here: <https://marketcrimes.to/2020/09/28/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

The rumors are a second report is coming soon that is even more explosive. They have a tip line as well, so anyone with information might want to send something in.



DrinkDrank1 (4)
User Actions ▼

October 29, 2020 - 06:16 PM
21 Reads
Post# 31810207

Looks like the Moez Kassam Report is back up

Investigative report looks at 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.

Report is here: <https://marketcrimes.to/2020/09/28/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

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DrinkDrank1 (4)
User Actions ▼

October 29, 2020 - 07:33 PM
33 Reads
Post# 31810433

Is Anson Funds a problem for all Canadian investors?

Investigative report looks at 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.

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Hardy4 (1)
User Actions ▾

October 29, 2020 - 12:29 PM
45 Reads
Post# 31803803

Billions stolen from ordinary investors by hedge fund

Investigative report looks at 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.

Report is here: <https://marketcrimes.to/2020/09/28/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>

The rumors are a second report is coming soon that is even more explosive. They have a tip line as well, so anyone with information might want to send something in.



shooter300 (71)
User Actions ▾

October 07, 2020 - 01:02 PM
92 Reads
Post# 31680587

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. <http://marketcrimes.ws/2020/10/02/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/> (get it while it's hot because this story's been bouncing around domains and URLs. Must be under attack.



shooter300 (71)
User Actions ▾

October 07, 2020 - 01:01 PM
89 Reads
Post# 31680581

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. <http://marketcrimes.ws/2020/10/02/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/> (get it while it's hot because this story's been bouncing around domains and URLs. Must be under attack.

24085584.6

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ErikaGross (0)
User Actions ▾

October 01, 2020 - 12:01 PM

25 Reads

Post# 31649054

A big scandal might be unfolding in Canadian markets

Interesting investigative piece looking at a short selling group that have scammed investors out of billions. The original site has been DDOS attacked but you can read the report they don't want you to read here: <https://archive.st/archive/2020/9/stockmanipulators.com/v3ix/stockmanipulators.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/index.html>

And here (this one is a bit slow but it does load):

<https://web.archive.org/web/20200928200023/https://stockmanipulators.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>



SandraZ (0)
User Actions ▾

September 30, 2020 - 12:38 PM

56 Reads

Post# 31642037

These short sellers soured the entire cannabis market...

Interesting investigative piece looking at a short selling group that have scammed investors out of billions. It's a must read: <https://stockmanipulators.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure/>



cool888 (200)
User Actions ▾

September 27, 2020 - 07:56 PM

114 Reads

Post# 31627246

Nothing to do with \$ACB... thought of passing it around

<https://moezkassam.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure-2/>



cool888 (200)
User Actions ▾

September 27, 2020 - 07:58 PM

84 Reads

Post# 31627249

Nothing to do with \$ABX.. thought of passing it around

<https://moezkassam.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure-2/>

24085584.6

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NEW YORK

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Blakes



thorgb1 (57)

User Actions ▾

September 27, 2020 - 05:42 PM

173 Reads

Post# 31627050

Expose on Moez Kassem....

Exposes this maggot for what he is. Link here



cool888 (200)

User Actions ▾

September 27, 2020 - 07:16 PM

81 Reads

Post# 31627194

Nothing to do with \$CIO... thought of passing it around

<https://moezkassam.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure-2/>



Findingmoney (236)

User Actions ▾

September 28, 2020 - 06:20 AM

78 Reads

Post# 31627748

Tale of Corruption

<https://moezkassam.com/moez-kassam-and-anson-funds-a-tale-of-corruption-greed-and-failure-2/>

This is Exhibit "J" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

Wong, Winnie

From: Stockhouse Member Support <support@stockhouse.com>
Sent: Monday, March 29, 2021 6:52 PM
To: Wong, Winnie
Cc: Gary Kelly; Laura Salvatori; Sunny Puri; Fischer, Iris; DiMatteo, Christopher; Pulfer, Kaley
Subject: Re: Correspondence from Blakes/Anson Funds

External Email | Courrier électronique externe

Please type your reply above this line

Your support request has been updated. Reply to this email to add additional comments.

Member Advocate G (Stockhouse Member Support)

Mar 29, 2021, 3:52 PM PDT

Hello Iris,

Apologies for the late reply. Please note that we continue to put considerable effort into daily processing your clients abuse complaints and proactively reviewing these accounts for patterns we can use to block them however there is little new progress that will be made through this angle of attack as the people involved are savvy and can change their information profile.

While Stockhouse will continue with these efforts we will also not oppose efforts to identify theses users through a Norwich Order. The order, once obtained, will compel us to disclose any identifying information and data to you regarding the user name(s) in question. The Order, which would be issued against Stockhouse Publishing, will result in a raw data file being sent that will expose the users email address, and IP address(es) used when engaged in the forums. We will also disclose any other identifying information we have on file, where available.

We ask that a draft be emailed to us at bullboards@stockhouse.com prior to being filed with the courts for our review and we can confirm if it is worded such that we will not need to contest it in court.

You must consider, that user accounts on Stockhouse Publishing are anonymous, and often, outside of an email used for registration and IP addresses, there may not be any further information available.

Also note that there are costs associated with producing the data. For a single petition/order we ask to be compensated \$150.00 + GST/HST. Each additional member named in the same petition/order adds \$50.00; so if two members are named in the same order, the total would be \$200.00 + GST/HST. As further clarification if two members were named in two separate petitions/orders, the compensation would be \$150.00 + GST/HST each.

Regards,

Stockhouse Support Team

Wong, Winnie

Mar 18, 2021, 6:45 AM PDT

Dear Mr. Kelly,

Please find enclosed correspondence from Ms. Fischer of today's date.

Winnie Wong

Legal Assistant to Iris Fischer, Iris Antonios,

Erin Hoult & Gregory Sheppard

Email: winnie.wong@blakes.com

Dir: 416.863.2569



Blake, Cassels & Graydon LLP

199 Bay Street, Suite 4000, Toronto ON M5L 1A9

Tel: 416-863-2400 Fax: 416-863-2653

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L'information paraissant dans ce message électronique est CONFIDENTIELLE. Si ce message vous est parvenu par erreur, veuillez immédiatement m'en aviser par téléphone ou par courriel et en détruire toute copie. Merci.

Attachment(s)

[24087256-v1-Letter to G. Kelly, Stockhouse Publishing Ltd., dated March 18, 2021.PDF](#)



This email is a service from the Member Support Team at Stockhouse Publishing Ltd.

This is Exhibit "K" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

Wong, Winnie

From: Fischer, Iris
Sent: Wednesday, April 7, 2021 9:40 AM
To: Stockhouse Member Support
Cc: Gary Kelly; Laura Salvatori; Sunny Puri; DiMatteo, Christopher; Pulfer, Kaley
Subject: RE: Correspondence from Blakes/Anson Funds

Dear Stockhouse team:

Thank you for your response. We appreciate your confirmation that Stockhouse will not oppose a court order for disclosure of IP addresses and other identifying information connected to the abusive posts.

We would like to clarify some logistical matters for obtaining the court order. We have compiled a list of the URLs for the relevant posts, both those that remain on the Stockhouse website and those that have already been removed. Anson intends to seek a court order for disclosure of IP address and identifying information for each member who published one of the posts mentioned in the list. We would appreciate your confirmation that Stockhouse can comply with a court order in that form. If you have input at this time, please let us know how you suggest the court order should be structured. We will send you a draft of the motion materials before they are filed in court, as you suggested.

We would also like to confirm the cost for Stockhouse to produce the data. In your email below, you state that where one court order is requested, Stockhouse will ask to be compensated \$150, plus \$50 per additional member named in the order. Anson will seek one court order relating to multiple posts. Please confirm that, if the court order is in the format described above – i.e., that Stockhouse provide identifying information for all users who published one of the posts mentioned on a specified list – the cost to Anson of producing the data in compliance with the order would be \$150, plus \$50 for each additional post in question. As an example, calculated in this method, if Anson sought user information for 3 posts, the cost would be \$250 (\$150 + \$50 + 50).

Please note that while Anson intends to seek a broad court order for disclosure of user information for all of the abusive posts in issue, Anson does not expect to immediately require Stockhouse to disclose user information for all of the posts. Rather, to manage the information and time requirements on Stockhouse, Anson intends to ask Stockhouse to produce the information in tranches, beginning with a smaller subset of the abusive posts. We assume that Stockhouse would ask to be compensated in corresponding tranches as well.

Thank you for your assistance.

Best regards,

Iris Fischer

Partner

Iris.fischer@blakes.com

Dir: 416-863-2408

**I am available and may be reached at my direct line above*

From: Stockhouse Member Support <support@stockhouse.com>
Sent: Monday, March 29, 2021 6:52 PM
To: Wong, Winnie <winnie.wong@blakes.com>
Cc: 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>
Subject: Re: Correspondence from Blakes/Anson Funds

External Email | Courriel électronique externe

Please type your reply above this line

Your support request has been updated. Reply to this email to add additional comments.

Member Advocate G (Stockhouse Member Support)

Mar 29, 2021, 3:52 PM PDT

Hello Iris,

Apologies for the late reply. Please note that we continue to put considerable effort into daily processing your clients abuse complaints and proactively reviewing these accounts for patterns we can use to block them however there is little new progress that will be made through this angle of attack as the people involved are savvy and can change their information profile.

While Stockhouse will continue with these efforts we will also not oppose efforts to identify theses users through a Norwich Order. The order, once obtained, will compel us to disclose any identifying information and data to you regarding the user name(s) in question. The Order, which would be issued against Stockhouse Publishing, will result in a raw data file being sent that will expose the users email address, and IP address(es) used when engaged in the forums. We will also disclose any other identifying information we have on file, where available.

We ask that a draft be emailed to us at bullboards@stockhouse.com prior to being filed with the courts for our review and we can confirm if it is worded such that we will not need to contest it in court.

You must consider, that user accounts on Stockhouse Publishing are anonymous, and often, outside of an email used for registration and IP addresses, there may not be any further information available.

Also note that there are costs associated with producing the data. For a single petition/order we ask to be compensated \$150.00 + GST/HST. Each additional member named in the same petition/order adds \$50.00; so if two members are named in the same order, the total would be \$200.00 + GST/HST. As further clarification if two members were named in two separate petitions/orders, the compensation would be \$150.00 + GST/HST each.

Regards,

Stockhouse Support Team

Wong, Winnie

Mar 18, 2021, 6:45 AM PDT

Dear Mr. Kelly,

Please find enclosed correspondence from Ms. Fischer of today's date.

Winnie Wong

Legal Assistant to Iris Fischer, Iris Antonios,

Erin Hoult & Gregory Sheppard

Email: winnie.wong@blakes.com

Dir: 416.863.2569



Blake, Cassels & Graydon LLP

199 Bay Street, Suite 4000, Toronto ON M5L 1A9

Tel: 416-863-2400 Fax: 416-863-2653

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Attachment(s)

[24087256-v1-Letter to G. Kelly, Stockhouse Publishing Ltd., dated March 18, 2021.PDF](#)



This email is a service from the Member Support Team at Stockhouse Publishing Ltd.

This is Exhibit "L" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

Wong, Winnie

From: Stockhouse Member Support <support@stockhouse.com>
Sent: Wednesday, April 7, 2021 6:32 PM
To: Wong, Winnie
Cc: Gary Kelly; Laura Salvatori; Sunny Puri; Fischer, Iris; DiMatteo, Christopher; Pulfer, Kaley
Subject: Re: RE: Correspondence from Blakes/Anson Funds

External Email | Courrier électronique externe

Please type your reply above this line

Your support request has been deemed solved. To reopen, simply reply to this email.

Member Advocate G (Stockhouse Member Support)

Apr 7, 2021, 3:31 PM PDT

Iris,

Please format the request by member name. If you click on the members name in each post you will be taken to a member profile page showing all of their posts. Using the URL shown in the browser at that time is the best way to ensure clear communication with us. Please note that getting the member name from other places than the URL at that location can be tricky as some members will use upper case i and lower case L interchangeable and it is not visible except in the URL which forces lower case. we suggest copy and paste, not hand retying. Please also provide us this list of member URL's in email body text along with the final court order so that we may also copy and paste.

Example: <https://stockhouse.com/members/concierge>

From experience we recommend that you word your petition so that we must provide all MEMBER information and not POST information. Include IP and Email and any other contact info we have including financial should they be a customer. By basing the request on the member name that made each post we will then be able to provide you a history of ALL IP addresses that member has connected with. This is necessary as we store IP addresses in relation to the post on each post that is made and not a separate sore of IP addresses related to the user account.

This means for cost calculation, if you submit a petition to the court with 30 example posts you claim as defamatory and these 30 posts were made by 10 users that we would ask you to pay \$600.00 (\$150 + (9x\$50.00)).

This method is both easier for us and more cost effective for you as you get all IP history for the the user

and it is just one set of user based reports per user that we run for you.

Regarding broader court order the info we have will be the same at any level and the only difference for us will be in the amount of user names provided.

If you wish further clarification we can arrange a phone call with someone from the operations team.

Regards,

Stockhouse Support Team



This email is a service from the Member Support Team at Stockhouse Publishing Ltd.

This is Exhibit "M" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

Wong, Winnie

From: Fischer, Iris
Sent: Friday, April 16, 2021 4:24 PM
To: Stockhouse Member Support
Cc: Gary Kelly; Laura Salvatori; Sunny Puri; DiMatteo, Christopher; Pulfer, Kaley
Subject: RE: RE: Correspondence from Blakes/Anson Funds
Attachments: 24106291-v1-Notice of Motion re Stockhouse.PDF

Dear Stockhouse Team,

Thank you very much for the below. Attached is our draft notice of motion. If you could review and advise if there are any changes that you would suggest, that would be much appreciated. Please note there is one question for you in the document, in bold/yellow.

If you are able to revert early next week, that would be helpful as we are hoping to file this with the court as soon as possible.

Best,

Iris

Iris Fischer

Partner

Iris.fischer@blakes.com

Dir: 416-863-2408

**I am available and may be reached at my direct line above*

From: Stockhouse Member Support <support@stockhouse.com>
Sent: Wednesday, April 7, 2021 6:32 PM
To: Wong, Winnie <winnie.wong@blakes.com>
Cc: 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>
Subject: Re: RE: Correspondence from Blakes/Anson Funds

External Email | Courrier électronique externe

Please type your reply above this line

Your support request has been deemed solved. To reopen, simply reply to this email.

Member Advocate G (Stockhouse Member Support)

Apr 7, 2021, 3:31 PM PDT

Iris,

Please format the request by member name. If you click on the members name in each post you will be taken to a member profile page showing all of their posts. Using the URL shown in the browser at that time is the best way to ensure clear communication with us. Please note that getting the member name from other places than the URL at that location can be tricky as some members will use upper case i and lower case L interchangeable and it is not visible except in the URL which forces lower case. we suggest copy and paste, not hand retyping. Please also provide us this list of member URL's in email body text along with the final court order so that we may also copy and paste.

Example: <https://stockhouse.com/members/concierge>

From experience we recommend that you word your petition so that we must provide all MEMBER information and not POST information. Include IP and Email and any other contact info we have including financial should they be a customer. By basing the request on the member name that made each post we will then be able to provide you a history of ALL IP addresses that member has connected with. This is necessary as we store IP addresses in relation to the post on each post that is made and not a separate sore of IP addresses related to the user account.

This means for cost calculation, if you submit a petition to the court with 30 example posts you claim as defamatory and these 30 posts were made by 10 users that we would ask you to pay \$600.00 (\$150 + (9x\$50.00)).

This method is both easier for us and more cost effective for you as you get all IP history for the the user and it is just one set of user based reports per user that we run for you.

Regarding broader court order the info we have will be the same at any level and the only difference for us will be in the amount of user names provided.

If you wish further clarification we can arrange a phone call with someone from the operations team.

Regards,

Stockhouse Support Team



This email is a service from the Member Support Team at Stockhouse Publishing Ltd.

This is Exhibit "N" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

Wong, Winnie

From: Stockhouse Member Support <support@stockhouse.com>
Sent: Monday, April 19, 2021 6:45 PM
To: Wong, Winnie
Cc: Gary Kelly; Laura Salvatori; Sunny Puri; Fischer, Iris; DiMatteo, Christopher; Pulfer, Kaley
Subject: Re: RE: RE: Correspondence from Blakes/Anson Funds

External Email | Courrier électronique externe

Please type your reply above this line

Your support request has been updated. Reply to this email to add additional comments.

Member Advocate G (Stockhouse Member Support)

Apr 19, 2021, 3:44 PM PDT

Please note the concerns with the following two sections. In almost all cases we do not have member names. The only information we currently require for a registration is a validated email address and we log the IP addresses used while posting content. In rare cases members may purchase optional services like real time data streaming and in these cases we will be able to report on the presence of a financial relationship but note that for PCI compliance Stockhouse does not store any names, credit cards or other identifying information of a purchaser and would need to direct you to our 3rd party partner at that time. The Email address would be the connecting key data point between systems at that point:

(i) the name(s) of the person(s) who registered each member account;

(iii) any financial information associated with the account that could identify the person(s) who created and/or accessed and/or is otherwise associated with the account; [NOTE: Confirm with Stockhouse what type of financial information may be available]

For these two sections we would ask that you present to Stockhouse any specific POST URL's still visible at this time that you feel contain false and defamatory content that is causing damage if not removed from public view:

(aa) Following communications between the Plaintiffs and Stockhouse, and in light of its website terms and conditions of use, Stockhouse has removed some of the Abusive Posts from its platform. However, the vast majority of the Abusive Posts remain accessible online.

(ff) Stockhouse has voluntarily removed some of the Abusive Posts from its website on the grounds that they violate its website terms and conditions, which prohibit content that is “false, misleading, unlawful...harmful, threatening, defamatory, libelous, abusive, inflammatory, harassing, vulgar, obscene, fraudulent, [or] invasive of privacy or publicity rights”.

Regards,

Stockhouse Support Team

Member Advocate G (Stockhouse Member Support)

Apr 19, 2021, 3:19 PM PDT

Received and under review. Will reply shortly with specific comments if any.

Regards,

Stockhouse Support Team



This email is a service from the Member Support Team at Stockhouse Publishing Ltd.

This is Exhibit "O" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

Wong, Winnie

From: Fischer, Iris
Sent: Tuesday, April 20, 2021 9:47 PM
To: Stockhouse Member Support
Cc: Gary Kelly; Laura Salvatori; Sunny Puri; DiMatteo, Christopher; Pulfer, Kaley
Subject: RE: RE: RE: Correspondence from Blakes/Anson Funds
Attachments: 24093269-v7-Stockhouse - Notice of Motion re Disclosure.DOCX; 24093269-vpdf-Stockhouse - Notice of Motion re Disclosure.PDF

Dear Stockhouse team,

Thank you for your comments on our draft notice of motion. We have revised the motion in line with the comments. An updated clean version, and a blackline copy showing the changes, are attached. The changes are as follows:

- We appreciate that Stockhouse generally does not expect to have the names of the persons who registered the relevant accounts, and that in most cases only an email address is provided upon registration. We have revised the motion to make clear that we are only asking for the names of the registrants if they were provided to Stockhouse.
- We also appreciate the clarification that Stockhouse does not store financial information for paid members. Accordingly, we have revised the motion to request disclosure of whether the member account is a paid account and, if so, which third party provider would have information about the relevant user.

Finally, thank you for agreeing to consider removing further abusive posts about our clients. A list of URLs for abusive posts that remain accessible on Stockhouse's website is below. With your confirmation that these posts have been removed, we will amend paragraphs (aa) and (ff) of the motion (which you referenced below).

Thank you.

<https://stockhouse.com/companies/bullboard/avcnf/avicanna-inc-ordinary-shares?postid=32893606>
<https://stockhouse.com/companies/bullboard/avcnf/avicanna-inc-ordinary-shares?postid=32906043>
<https://stockhouse.com/companies/bullboard/bmo/bank-of-montreal?postid=32844886>
<https://stockhouse.com/companies/bullboard/c.glh/golden-leaf-holdings-ltd?postid=32739594>
<https://stockhouse.com/companies/bullboard/c.glh/golden-leaf-holdings-ltd?postid=32741290>
<https://stockhouse.com/companies/bullboard/c.glh/golden-leaf-holdings-ltd?postid=32741415>
<https://stockhouse.com/companies/bullboard/c.glh/golden-leaf-holdings-ltd?postid=32741415>
<https://stockhouse.com/companies/bullboard/c.gtii/green-thumb-industries-inc-sub-voting?postid=32845797>
<https://stockhouse.com/companies/bullboard/c.sol/sol-global-investments-corp?postid=32844859>
<https://stockhouse.com/companies/bullboard/c.spm/spearmint-resources-inc?postid=32739465>
<https://stockhouse.com/companies/bullboard/c.ter/terrascend-corp?postid=32845795>
<https://stockhouse.com/companies/bullboard/c.ult/united-lithium-corp?postid=32844880>
<https://stockhouse.com/companies/bullboard/cron?postid=32844863>
<https://stockhouse.com/companies/bullboard/dmgf/dmg-blockchain-solutions-inc?postid=32739733>
<https://stockhouse.com/companies/bullboard/fdvrf/facedrive?postid=32805035>
<https://stockhouse.com/companies/bullboard/fngu/bank-of-montreal?postid=32844886>
<https://stockhouse.com/companies/bullboard/gldff/golden-leaf-holdings-ltd?postid=32739594>
<https://stockhouse.com/companies/bullboard/gldff/golden-leaf-holdings-ltd?postid=32741290>
<https://stockhouse.com/companies/bullboard/gldff/golden-leaf-holdings-ltd?postid=32741415>
<https://stockhouse.com/companies/bullboard/gldg/goldmining-inc?postid=32840352>
<https://stockhouse.com/companies/bullboard/gnaf/bank-of-montreal-perp-pfd-cl-b-ser-15?postid=32844886>
<https://stockhouse.com/companies/bullboard/grodf/the-green-organic-dutchman-holdings-ltd?postid=32845796>
<https://stockhouse.com/companies/bullboard/kodk/eastman-kodak-company-common-new?postid=31641823>
<https://stockhouse.com/companies/bullboard/mttpf/medmen-enterprises-inc?postid=32844850>

<https://stockhouse.com/companies/bullboard/nem/newmont-mining-corp-holding-co?postid=32845791>
https://stockhouse.com/companies/bullboard/p_bchain?symbol=emhtf&postid=32845794
<https://stockhouse.com/companies/bullboard/post?symbol=v.cron&postid=32844863>
<https://stockhouse.com/companies/bullboard/scyb/bluma-wellness-inc-ordinary-shares?postid=32839037>
<https://stockhouse.com/companies/bullboard/scyb/bluma-wellness-inc-ordinary-shares?postid=32844859>
<https://stockhouse.com/companies/bullboard/shrmf/champignon-brands-inc?postid=32743204>
<https://stockhouse.com/companies/bullboard/shrmf/champignon-brands-inc?postid=32743220>
<https://stockhouse.com/companies/bullboard/sndl/sundial-growers-inc?postid=32845799>
<https://stockhouse.com/companies/bullboard/sndl/sundial-growers-inc-ordinary-shares?postid=32845799>
<https://stockhouse.com/companies/bullboard/solcf/bluma-wellness-inc-ordinary-shares?postid=32844859>
<https://stockhouse.com/companies/bullboard/solcf/sol-global-investments-corp?postid=32715037>
<https://stockhouse.com/companies/bullboard/solcf/sol-global-investments-corp?postid=32715193>
<https://stockhouse.com/companies/bullboard/spmtf/spearmint-resources-inc?postid=32739465>
<https://stockhouse.com/companies/bullboard/t.ahc/apollo-healthcare-corp-class-b?postid=32826296>
<https://stockhouse.com/companies/bullboard/t.apha/aphria-inc?postid=31628415>
<https://stockhouse.com/companies/bullboard/t.apha/aphria-inc?postid=32844831>
<https://stockhouse.com/companies/bullboard/t.avcn/avicanna-inc-ordinary-shares?postid=32893606>
<https://stockhouse.com/companies/bullboard/t.avcn/avicanna-inc-ordinary-shares?postid=32906043>
<https://stockhouse.com/companies/bullboard/t.bmo.p.c/bank-of-montreal?postid=32844886>
<https://stockhouse.com/companies/bullboard/t.bmo.p.t/bank-of-montreal?postid=32844886>
<https://stockhouse.com/companies/bullboard/t.bmo/bank-of-montreal?postid=32844886>
<https://stockhouse.com/companies/bullboard/t.cron/cronos-group-inc?postid=31651430>
<https://stockhouse.com/companies/bullboard/t.cron/cronos-group-inc?postid=32844863>
<https://stockhouse.com/companies/bullboard/t.ngt/newmont-corporation?postid=32845791>
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<https://stockhouse.com/news/newswire/2016/01/19/how-short-sellers-are-killing-companies-and-market>
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<https://stockhouse.com/companies/bullboard?symbol=t.acb&postid=3163674>

Iris Fischer

Partner

Iris.fischer@blakes.com

Dir: 416-863-2408

**I am available and may be reached at my direct line above*

From: Stockhouse Member Support <support@stockhouse.com>

Sent: Monday, April 19, 2021 6:45 PM

To: Wong, Winnie <winnie.wong@blakes.com>

Cc: 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>

Subject: Re: RE: RE: Correspondence from Blakes/Anson Funds

External Email | Courrier électronique externe

Please type your reply above this line

Your support request has been updated. Reply to this email to add additional comments.

Member Advocate G (Stockhouse Member Support)

Apr 19, 2021, 3:44 PM PDT

Please note the concerns with the following two sections. In almost all cases we do not have member names. The only information we currently require for a registration is a validated email address and we log the IP addresses used while posting content. In rare cases members may purchase optional services like real time data streaming and in these cases we will be able to report on the presence of a financial relationship but note that for PCI compliance Stockhouse does not store any names, credit cards or other identifying information of a purchaser and would need to direct you to our 3rd party partner at that time. The Email address would be the connecting key data point between systems at that point:

(i) the name(s) of the person(s) who registered each member account;

(iii) any financial information associated with the account that could identify the person(s) who created and/or accessed and/or is otherwise associated with the account; [NOTE: Confirm with Stockhouse what type of financial information may be available]

For these two sections we would ask that you present to Stockhouse any specific POST URL's still visible at this time that you feel contain false and defamatory content that is causing damage if not removed

from public view:

(aa) Following communications between the Plaintiffs and Stockhouse, and in light of its website terms and conditions of use, Stockhouse has removed some of the Abusive Posts from its platform. However, the vast majority of the Abusive Posts remain accessible online.

(ff) Stockhouse has voluntarily removed some of the Abusive Posts from its website on the grounds that they violate its website terms and conditions, which prohibit content that is “false, misleading, unlawful...harmful, threatening, defamatory, libelous, abusive, inflammatory, harassing, vulgar, obscene, fraudulent, [or] invasive of privacy or publicity rights”.

Regards,

Stockhouse Support Team

Member Advocate G (Stockhouse Member Support)

Apr 19, 2021, 3:19 PM PDT

Received and under review. Will reply shortly with specific comments if any.

Regards,

Stockhouse Support Team



This email is a service from the Member Support Team at Stockhouse Publishing Ltd.

This is Exhibit "P" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

Wong, Winnie

From: Stockhouse Member Support <support@stockhouse.com>
Sent: Friday, April 23, 2021 7:29 PM
To: Wong, Winnie
Cc: Gary Kelly; Laura Salvatori; Sunny Puri; Fischer, Iris; DiMatteo, Christopher; Pulfer, Kaley
Subject: Re: RE: RE: Correspondence from Blakes/Anson Funds

Categories: Orange Category

External Email | Courrier électronique externe

Please type your reply above this line

Your support request has been updated. Reply to this email to add additional comments.

Member Advocate G (Stockhouse Member Support)

Apr 23, 2021, 4:28 PM PDT

Draft reviewed. This version is acceptable as is and Stockhouse will not contest it.

Regards,

Stockhouse Support Team

Member Advocate A (Stockhouse Member Support)

Apr 23, 2021, 4:06 PM PDT

All the post you provided links for have been removed from public view. We are reviewing the updated application and will reply shortly.

Regards,

Stockhouse Support Team

Member Advocate G (Stockhouse Member Support)

Apr 19, 2021, 3:44 PM PDT

Please note the concerns with the following two sections. In almost all cases we do not have member names. The only information we currently require for a registration is a validated email address and we log the IP addresses used while posting content. In rare cases members may purchase optional services

like real time data streaming and in these cases we will be able to report on the presence of a financial relationship but note that for PCI compliance Stockhouse does not store any names, credit cards or other identifying information of a purchaser and would need to direct you to our 3rd party partner at that time. The Email address would be the connecting key data point between systems at that point:

(i) the name(s) of the person(s) who registered each member account;

(iii) any financial information associated with the account that could identify the person(s) who created and/or accessed and/or is otherwise associated with the account; [NOTE: Confirm with Stockhouse what type of financial information may be available]

For these two sections we would ask that you present to Stockhouse any specific POST URL's still visible at this time that you feel contain false and defamatory content that is causing damage if not removed from public view:

(aa) Following communications between the Plaintiffs and Stockhouse, and in light of its website terms and conditions of use, Stockhouse has removed some of the Abusive Posts from its platform. However, the vast majority of the Abusive Posts remain accessible online.

(ff) Stockhouse has voluntarily removed some of the Abusive Posts from its website on the grounds that they violate its website terms and conditions, which prohibit content that is "false, misleading, unlawful...harmful, threatening, defamatory, libelous, abusive, inflammatory, harassing, vulgar, obscene, fraudulent, [or] invasive of privacy or publicity rights".

Regards,

Stockhouse Support Team

Member Advocate G (Stockhouse Member Support)

Apr 19, 2021, 3:19 PM PDT

Received and under review. Will reply shortly with specific comments if any.

Regards,

Stockhouse Support Team



This email is a service from the Member Support Team at Stockhouse Publishing Ltd.

This is Exhibit "Q" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

(<https://stockhouse.com/>) [Join Now](#)

[Home \(https://stockhouse.com/home\)](https://stockhouse.com/home)

[Sign In](#)

Privacy & Cookie Policy

Effective date August 10, 2018

We use cookies on this site

To use our website you must consent to storing cookies on your browser. Stockhouse.com has always used cookies and our use of cookies has not changed, but recent changes to the law mean that we now have to obtain your consent. Please take note that we require the full acceptance of all the cookies we use. There is no option to accept only some cookies. This means that if you do not grant us permission then you will not be able to view any part of our service, effectively blocking access to stockhouse.com.

If you revoke consent we will set our cookies in your browser to expire and you will be shown a confirmation page. After that, if you visit our website again, you will see this cookie acceptance page until you accept our policy.

How to contact us

If you have any questions about this Privacy Policy, or wish to make a request regarding your information please contact us:

By email: compliance@stockhouse.com

By mail: 1185 West Georgia Street, Suite 1625, Vancouver BC, Canada

[Markets \(https://stockhouse.com/markets\)](https://stockhouse.com/markets)

Stockhouse Publishing Ltd. ("us", "we", or "our") operates the stockhouse.com website (hereinafter referred to as the "Service"). This Policy applies to Stockhouse Publishing Ltd., its subsidiaries, and any of its websites containing the Stockhouse name.

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Disclaimer, accessible from stockhouse.com

Meaning of the terms we use aka 'definitions'

ServiceService is the stockhouse.com website operated by Stockhouse Publishing Ltd.

Personal DataPersonal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage DataUsage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

CookiesCookies are small files stored on your device (computer or mobile device).

Data ControllerData Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processor (or Service Provider) Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

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We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User) Data Subject is any living individual who is using our Service and is the subject of Personal Data.

(<https://stockhouse.com/>) [Join Now](#)

What types of info we receive and collect on you

Sign In

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

Portfolio (<https://stockhouse.com/portfolio>)

Email address

First name and last name

Phone number

Address, State, Province, ZIP/Postal code, City

Credit card number

Cookies and Usage Data

With your permission we may use your Personal Data to contact you with email newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

Usage Data

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

DealRoom (<https://stockhouse.com/dealroom>)

Tracking & Cookie Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an pseudonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you will not be able to use our Service.

Examples of Cookies we use:

Session Cookies. We use Session Cookies to operate our Service.

Preference Cookies. We use Preference Cookies to remember your preferences and various settings.

Security Cookies. We use Security Cookies for security purposes.

Advertising Cookies. Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

How we use your info

Stockhouse Publishing Ltd. uses the collected data for various purposes:

To provide and maintain our Service

To notify you about changes to our Service

To allow you to participate in interactive features of our Service when you choose to do so

To provide customer support

To gather analysis or valuable information so that we can improve our Service

To monitor the usage of our Service

To detect, prevent and address technical issues

[\(https://stockhouse.com/\)](https://stockhouse.com/) [Join Now](#)
Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Stockhouse Publishing Ltd. legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Stockhouse Publishing Ltd. may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- For payment processing purposes
- To comply with the law

How long we keep your data

Stockhouse Publishing Ltd. will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

Stockhouse Publishing Ltd. will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

Where we transfer and store your data

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside Canada and choose to provide information to us, please note that we transfer the data, including Personal Data, to Canada and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Stockhouse Publishing Ltd. will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

When will we disclose your personal info

Aggregate information

We do sell aggregate information. For example, we might tell an advertiser that there are 120,000 registered users in a given city, but we will not tell them that John Smith is one of them, nor will we give them his e-mail address without his express consent. We may also use this aggregated information to help the advertisers reach the kind of audience they want. They may give us an advertisement and tell us the type of audience they want to reach (for example, gold investors in a certain area code).

Stockhouse Publishing Ltd. (or people working on our behalf under contracts and confidentiality agreements) would then take the advertisement and display it to users who meet those criteria. We may also disclose aggregate information (for example, information showing that 35 million of our readers clicked on a particular web advertising banner last month) in order to report on our services to partners, advertisers, and other third parties and the public.

With specific consent

We may disclose personal information in some other limited circumstances, but we will specifically describe them to you when we collect the information and gain your express consent, such as in the rules of a contest or a new service. For example, if we are going to give personal information to a contest sponsor, we will disclose it when you sign up for the contest, so that you can decide if you want to enter.

If Stockhouse Publishing Ltd. is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Disclosure for Law Enforcement

Sign In

Under certain circumstances, Stockhouse Publishing Ltd. may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Stockhouse Publishing Ltd. may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Stockhouse Publishing Ltd.
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

How we keep your data secure

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA)

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser however this selection will not change how we interact with your browser. To change your Privacy settings with our Service please review the section of this policy called 'How to change your cookie preferences'.

Your Data Protection Rights under the General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Stockhouse Publishing Ltd. aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

The right to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to our processing of your Personal Data.

The right of restriction. You have the right to request that we restrict the processing of your personal information.

The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

The right to withdraw consent. You also have the right to withdraw your consent at any time where Stockhouse Publishing Ltd. relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

How to edit or remove your info

(<https://stockhouse.com/>)

Join Now

If you want to correct or change information we have about you, please do so by signing into your membership account and selecting your member name on the top right side of the page and choosing the options to edit your info.

To change your email preferences simply select the link in every email we send.

To cancel your account, please contact us using the web form located here:

https://support.stockhouse.com/anonymous_requests/new

Who we share your data with

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We use third-party Service Providers to monitor and analyse the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page:

<https://policies.google.com/privacy?hl=en>

Advertising

We use third-party Service Providers to show advertisements to you to help support and maintain our Service.

Adzerk

Adzerk is an advertising service provided that we use to manage our advertising. For more information about Adzerk, please visit:

Adzerk Privacy Policy: <https://dev.adzerk.com/docs/privacy-policy-ad-server>

Adzerk Cookie Policy: <https://dev.adzerk.com/docs/cookies-set-by-adzerk>

Google AdSense & DoubleClick Cookie

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Marvel Discoveries Spins Out Two Properties & Expects Blackfly Project Drilling Soon
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Green River Gold Corp. Prepares for Prospecting and a Soil Geochemical Survey on its Kymar Silver Property
(<https://themarketherald.ca/green-river-gold-corp-cseccr-prepares-for-prospecting-and-a-soil-geochemical-survey-on-its-kymar-silver-property-2021-05-19/>)



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This is Exhibit "R" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

☒ RULE/LA RÈGLE 26.02 (a)

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

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.....
REGISTRAR GREFFIER
SUPERIOR COURT OF JUSTICE COUR SUPÉRIEURE DE JUSTICE
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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 Plaintiff's 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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Anson Funds Management LP, Anson Investments
Master Fund LP, Moez Kassam, and Allen
Spektor*

**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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Joseph Groia, LSO No. 20612J

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

This is Exhibit "S" referred to in the Affidavit of Sunny Puri, sworn remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, remotely before me at the City of Richmond Hill, in the Province of Ontario, on May 27, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Takings Affidavits (or as may be)

Jennifer Maringola,
a Commissioner, etc., Province
of Ontario, for Blake, Cassels &
Graydon LLP, Barrister and Solicitors.
Expires January 28, 2023.

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 -

**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 JACOB DOXTATOR

- 1) The Defendant, Jacob Doxtator (“Jacob”), is 20 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 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 Statement of Claim related to the matters pleaded. Jacob has not engaged in any of the unlawful, tortious or inappropriate behaviour alleged against him.
- 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.
- 6) Jacob does not know who John Doe is. He has no knowledge, information or belief as to who those persons described in the Claim are. Jacob is Robert Doxtator's ("Robert") cousin but he has not conspired, agreed or participated in any agreement or conspiracy with Robert. Most of his discussions with Robert are about family or hunting.
- 7) Jacob does not trade in securities. 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 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 Statement of Claim. He had no knowledge that the websites called Stockhouse, Hindenburg Research or the other sites listed in paragraphs 98 of the Statement of Claim even existed.
- 10) Jacob had nothing to do with any communications with the regulators as alleged in paragraph 164. 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) 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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Iris Fischer LSO No. 52762M

Lawyers for the Plaintiffs

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

Plaintiff

and

**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

STATEMENT OF DEFENCE

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Joseph Groia, LSO No. 20612J

Lawyers for the Defendant, Jacob Doxtator

ANSON ADVISORS INC. et al. -and- ROBERT LEE DOXTATOR et al.
Plaintiffs Defendants

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

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Proceeding commenced at Toronto

**MOTION RECORD OF
THE MOVING PARTIES**

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Master Fund LP and Moez Kassam