



FORM 1
(RULE 3-1 (1))

No. S- 257871
Vancouver Registry

In the Supreme Court of British Columbia

Between

Lorenzo Reid

Plaintiff

and

Keith Fraser, Vancouver Sun and Post Media Inc

Defendant

NOTICE OF CIVIL CLAIM

[Rule 22-3 of the Supreme Court Civil Rules applies to all forms.]

This action has been started by the plaintiff(s) for the relief set out in Part 2 below.

If you intend to respond to this action, you or your lawyer must

- (a) file a response to civil claim in Form 2 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim on the plaintiff.

If you intend to make a counterclaim, you or your lawyer must

- (a) file a response to civil claim in Form 2 and a counterclaim in Form 3 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim and counterclaim on the plaintiff and on any new parties named in the counterclaim.

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

Time for response to civil claim

A response to civil claim must be filed and served on the plaintiff(s),

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

CLAIM OF THE PLAINTIFF(S)

Part 1: STATEMENT OF FACTS

1. On March 23, 2021 Keith Fraser and the Vancouver Sun Newspaper owned by Postmedia Network Inc. Who in turn is owned by Chatham Asset Management. Published the following defamatory words.

Article content

The provincial director of civil forfeiture wants to keep the equivalent of \$137,000 in cash that was seized following the investigation of what is alleged to have been a mass-marketing fraud involving thousands of people in 89 countries.

In October 2016, the Vancouver police launched an investigation into several individuals in B.C. based on a report from U.S. authorities concerning the fraudulent scheme. Police obtained search warrants authorizing the seizure of mail from multiple mailboxes controlled by a company called Navigator Marketing. Surveillance was conducted on Navigator's business premises in Vancouver, and in February 2018, police executed search warrants at a commercial premises on Cook Street.

Article content

More than \$23,000 in cash in some 30-odd currencies was seized. Also seized were solicitations in the fraudulent scheme, victims' replies to the solicitations, as well as 26 computers and associated equipment.

Police also seized large amounts of cash from post office boxes controlled by Navigator Marketing that were located in Vancouver, Richmond, Burnaby, North Vancouver, Surrey and Langley.

Article content

The cash was sent by thousands of individuals in countries around the world who had responded to "Sweepstake Solicitations," according to a notice of civil claim filed in B.C. Supreme Court. The solicitations came in several forms and contained a variety of content that deceived victims into believing that they had won large monetary prizes, says the lawsuit.

Article content

"The Sweepstake Solicitations further deceived victims into believing that the payment of a small processing fee, usually between \$10 and \$50, was necessary in order to obtain the prize," it says.

Article content

"The Sweepstakes Solicitations were often 'personalized' by repeatedly mentioning the target victim's name in the solicitations."

Article content

The alleged victims, many of them elderly, sent replies, including payments in the form of cash, money orders and cheques.

Article content

"The victims who sent Sweepstakes Replies received either nothing in return for their payment, or in some cases a 'magazine' that listed publicly available opportunities to enter sweepstakes run by unaffiliated third parties," says the suit. "After responding to a Sweepstakes Solicitation, and as a result of having been added to a 'sucker list,' victims also often received an increased number of similar Sweepstakes Solicitations."

Article content

The director alleges that the cash is the proceeds of unlawful activity, contrary to a number of offences including fraud, mail fraud, and possession of property obtained by crime.

Article content

"The defendants acquired the cash by engaging in unlawful activities in British Columbia, including the unlawful conduct," says the lawsuit.

Article content

Alexander Quaglia is alleged to have been the sole director and officer of Navigator Marketing. Brent Koichi Nishiguchi is alleged to have been an employee or associate of Navigator with post office boxes controlled by Navigator rented under his name.

Article content

Rychard McKeown is alleged to have been an employee or owner of Navigator, and Lorenzo Reid is alleged to have been an employee or associate of the company. None of the four defendants appear to have been criminally charged.

Article content

No response has been filed to the lawsuit, which contains allegations that have not been tested in court. The defendants could not be reached.

Article content

kfraser@postmedia.com

Article content

twitter.com/keithfraser

2. The defamatory statements were understood to refer to the plaintiff. The plaintiff has absolutely no knowledge of anything listed above

3. The defamatory statements are defamatory of and concerning the plaintiff in their literal meaning. Alternatively, the words therein constitute malicious falsehoods in their literal meaning and have led or are calculated to lead persons to act in a manner that has caused or is calculated to cause actual loss, damage or expense to the plaintiff

Part 2: RELIEF SOUGHT

1. By reason of the publication of the Defamatory Statements the plaintiff has been greatly injured in his character, relationships, and reputation and has suffered damage.

2. The defendant's conduct is sufficiently egregious to merit an award of punitive and aggravated damages, the particulars of which are as follows.

(a) The defendants knew or ought to have known the statements are or could be false as they falsely stated that the plaintiff could not be reached for comment. No effort to reach the plaintiff was ever made.

(b) The defamatory statements were written in a way to insinuate the plaintiffs involvement in alleged nefarious actions without doing any actual confirmation. Damaging the relationships, reputation and character of the plaintiff

3. The publication of the false statements compiled in this Notice Of Civil Claim have caused and continue to cause injury, loss and damage to the plaintiff and should have been calculated by the defendants to expose the plaintiff to contempt and ridicule without confirming a response/reply/comment of its actual truth

4. An interlocutory and permanent injunction of the article and all its links preventing the defendants from continuing to defame the plaintiff or further defaming the plaintiff

5. General Damages

6. Special damages

7. Costs of this proceeding

8. Interest pursuant to Court Order Interest Act, R.S.B.C, 1996 c. 79

9. Such further other relief as to this Honourable Court seems just

Part 3: LEGAL BASIS

1. The plaintiff claims against the defendant in defamation, and pleads and relies upon the Libel and Slander Act, RCBC 1996, c. 263.

2. The plaintiff relies on the common law principles governing the assessment of damages for defamation

Plaintiff's address for service: reid2697@gmail.com

Fax number address for service (if any):

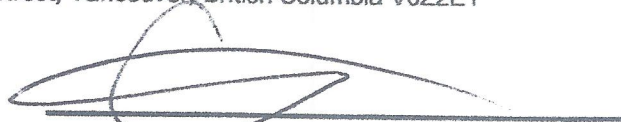
E-mail address for service (if any): reid2697@gmail.com

Place of trial: Vancouver Registry

The address of the registry is: 800 Smithe Street, Vancouver, British Columbia V6Z2E1

Date:

04-24/25



Signature of

Plaintiff

Lawyer for plaintiff(s)

Rule 7-1 (1) of the Supreme Court Civil Rules states:

(1) Unless all parties of record consent or the court otherwise orders, each party of record to an action must, within 35 days after the end of the pleading period,

(a) prepare a list of documents in Form 22 that lists

(i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and

(ii) all other documents to which the party intends to refer at trial, and

(b) serve the list on all parties of record.

APPENDIX

Part 1: CONCISE SUMMARY OF NATURE OF CLAIM:

Part 2: THIS CLAIM ARISES FROM THE FOLLOWING:

A personal injury arising out of:

- a motor vehicle accident
- medical malpractice
- another cause

A dispute concerning:

- contaminated sites
- construction defects
- real property (real estate)
- personal property
- investment losses
- the lending of money
- an employment relationship
- a will or other issues concerning the probate of an estate
- a matter not listed here
- the provision of goods or services or other general commercial matters

Part 3: THIS CLAIM INVOLVES:

- a class action
- maritime law
- aboriginal law
- constitutional law
- conflict of laws
- none of the above
- do not know

Part 4: Enactments

- Builders Lien Act
- Court Order Interest
- Insurance (Motor Vehicle) Act
- Insurance (Vehicle) Act
- Motor Vehicle Act
- Occupiers Liability Act
- Supreme Court Act
- Wills Variation Act
- Other _____