



Court File No.

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

ELISA HATEGAN

Plaintiff

and

CARYMA SA'D, LAW OFFICE OF CARYMA SA'D, [S]ADVOCACY PROFESSIONAL
CORPORATION

Defendants

STATEMENT OF CLAIM

1. The Plaintiff, Elisa Romero Hategan, professionally known as Elisa Hategan ("Ms. Hategan"), claims against the Defendants, Caryma Sa'd ("Ms. Sa'd"), Law Office Of Caryma Sa'd, [S]Advocacy Professional Corporation:

- (a) General damages in the amount of \$2,000,000 for defamation, harassment, negligence, fraud, interference with economic relations, and intentional infliction of mental suffering;
- (b) Special damages in the amount of \$30,000;
- (c) Aggravated and punitive damages in the amount of \$500,000;
- (d) An interlocutory Order requiring Ms. Sa'd to disclose and produce all records of any emails or other communications sent to any third parties referencing Ms. Hategan;
- (e) A mandatory injunction requiring Ms. Sa'd to take all reasonable steps to cause to be removed from the Internet or retract the Defamatory Statements,

as defined below, that Ms. Sa'd has posted anywhere on the internet;

- (f) A permanent injunction to restrain Ms. Sa'd from any further publication of defamatory statements and communications about Ms. Hategan, and from interfering with Ms. Hategan's personal and professional relationships, internet pages, websites, and social media accounts;
- (g) Pre- and post-judgment interest pursuant to the Courts of Justice Act, RSO 1990, c C.43, as amended;
- (h) the costs of this proceeding on a substantial indemnity basis, plus all applicable taxes; and
- (i) such further and other relief as to this Honourable Court deems just.

The Parties

2. The Plaintiff, Elisa Hategan ("**Ms. Hategan**") is a writer, freelance journalist and public speaker who resides in the greater Toronto area. Her articles have been published by Maclean's Magazine, Global News, Canadian Jewish News, NOW Magazine, and other outlets. The winner of multiple professional writer grants from Canada Council for the Arts, Ontario Arts Council, and Toronto Arts Council, her writing has appeared in literary magazines such as The Fiddlehead, Grain, and Contemporary Verse 2. In 2019 she was nominated for a RTDNA award for a Global News article; the RTDNA awards honour the best Canadian journalists, stations and news organizations broadcasting in audio, video and digital media. As a consultant on terrorism, radicalization and political extremism, she has been interviewed by news media including but not limited to the CBC, BBC, Newsweek Magazine, The Guardian, Toronto Sun, Toronto Star, Globe and Mail, Maclean's Magazine, Canadaland, Huffington Post and others. She operates the X account @elisahategan.

3. Elisa Hategan emigrated from communist Romania as a child, in 1986. In 1991, at age 16, she was recruited by Canada's largest white supremacist group in modern Canadian history, the Heritage Front, and became its female spokesperson. Two years later, at only 18 years old, Elisa defected from the group after spying on them for months. She filed over 30 affidavits with the Ontario Provincial Police, and testified against three group leaders in court. Her testimony was cited by the trial judge, Mme. Danielle Tremblay-Lamer, as being central to their conviction and jail sentences.
4. The Defendant, Caryma Sa'd ("**Ms. Sa'd**") is a resident of Mississauga, ON and a lawyer, political commentator, and self-described journalist with an office in Toronto, ON. She is a member of the Law Society of Ontario; her registered Law Society Number is 71430C. She operates a law firm business under the name Law Office of Caryma Sa'd, and [S]advocacy Professional Corporation, which are listed as co-defendants in this action.
5. Since 2020, Ms. Sa'd has gained notoriety online for her attendance at demonstrations and counter-demonstrations associated with infringements on civil liberties, trans rights clashes, and the Israel-Palestine conflict. She regularly posts videos of her and her boyfriend's attendances at demonstrations on X/formerly Twitter (hereinafter "**X**"), using the handle @carymarules. The account was co-created and is jointly operated by Sa'd and her boyfriend, Adam Lee Wasserman ("**Wasserman**"). Sa'd also has Facebook, Instagram, TikTok and Substack accounts where similar/identical content is uploaded.
6. Prior to meeting Ms. Hategan in summer 2021 and being mentored by her on how to rebrand herself as a journalist, Ms. Sa'd strived to become a social media influencer, and publicly denied being a journalist. Prior to Ms. Hategan's collaborative work on articles that were singularly attributed to Ms. Sa'd but were ghostwritten, co-authored, and/or edited by Ms. Hategan, Ms. Sa'd's website and bio gave no indication that she identified herself as a journalist or that she had any qualifications of this nature. In September 2023, Ms. Sa'd attempted to apply for membership in the Canadian Association of Journalists (CAJ), but her application was rejected.

Background and Context

The History between Elisa Hategan and Caryma Sa'd

7. Ms. Sa'd initially reached out to Ms. Hategan on X/formerly Twitter in July 2021, following an incident where Ms. Sa'd's attempt to host a public comedy show featuring controversial anti-mask, anti-lockdown public figure Chris Sky was met with outrage and backlash in the community. The ensuing brawl outside Sa'd's Chinatown Mall law office on Spadina Avenue inspired an article published by the Canadian Anti-Hate Network ("CAHN") that Sa'd believed was defamatory.
8. Ms. Hategan had previously engaged in civil litigation with CAHN Chair and co-founder Bernie Farber and another CAHN member, but lost the lawsuit. At the time Sa'd contacted her with questions about her legal adversaries in hopes of getting dirt to use against CAHN, Ms. Hategan was in the midst of trying to appeal the dismissal of her appeal due to time delays. She was also bound by a civil court-imposed gag order that prevented her from speaking about one of the litigants involved in the case. The only exception to the gag order was speaking with lawyers about the matter.
9. Ms. Sa'd, by virtue of being a lawyer, assured Ms. Hategan – through written Direct Messages ("DMs") and verbally – that everything she shared was bound by solicitor-client privilege. Ms. Sa'd pressed Ms. Hategan for details about her legal adversaries, asking for information that was not available online but was known to Ms. Hategan. At first Ms. Hategan hesitated, but Ms. Sa'd's reassurances convinced her that everything she told Sa'd would be kept confidential.
10. Ms. Sa'd used some of the "dirt" she obtained to wage a campaign against CAHN, which culminated in her own lawsuit, filed in July 2023. Sa'd's action against CAHN was dismissed in September 2023 as having "no reasonable cause of action and therefore no reasonable prospect of success". Sa'd's service attempt of CAHN Chair Bernie Farber at his house, which was filmed and posted on Sa'd's X account, resulted in a March 2024 finding by the Law Society of Ontario ("LSO") that Sa'd had:

- a) failed to act with honour and integrity
- b) engaged in harassing, and/or discriminatory conduct, and
- c) engaged in conduct that tends to bring discredit upon the legal profession.

11. The connection between Elisa Hategan and Caryma Sa'd quickly progressed into a close friendship and working relationship. Between December 2022 and September 30, 2023, they co-authored 12 articles that were published by Crier Media and NOW Magazine, with 3 additional works-in-progress on the go. Ms. Hategan also published an op-ed about Ms. Sa'd. The majority of the articles were published under Sa'd's name, with Hategan acting as ghostwriter and/or editor without a byline.
12. After commencing her journalistic collaborations and mentorship with Ms. Hategan, Ms. Sa'd began soliciting donations and crowdfunding for her "journalism" work. Sa'd reassured Ms. Hategan that she would split donations and moneys earned from this journalistic work with her, but she never did.
13. The understanding between Sa'd and Hategan was that Hategan was building Sa'd's "brand" as a "journalist" and influencer, and Sa'd would split profits and donations. At the time, Sa'd was reticent to call herself a "journalist". Hategan mentored Sa'd on how to rebrand herself as a "journalist", giving her advice and guidance on dealing with editors, sending queries, and the general editorial process, while also serving as an informal motivational coach. By mentoring Sa'd as a "journalist" and building up her "brand" to become profitable, Ms. Hategan believed that she was investing in her own future. In May 2023, Sa'd text-messaged her, "You are a big part of whatever success we have."
14. On September 12 2023, Ms. Sa'd and Ms. Hategan published a longform, 85-page investigative article titled "The Hategate Affair", which featured both their names as co-authors. The article was read by hundreds of thousands of people, if not millions, across Canada and internationally. Hategan authored two-thirds of the piece and edited the rest, with the express understanding that Sa'd would split all contacts and 50% of all donations and moneys that came from the article. Hategan reserved the Hategate domain URL and pointed it to a website Sa'd commissioned, which featured "Make a

Donation” buttons. Sa’d then used her popular social media accounts to solicit funding for “journalism”. Sa’d collected thousands of dollars as a result of the article. The money was collected through donation buttons, e-transfers to Sa’d’s bank and PayPal accounts, GoFundMe pages, and other sources unknown to Ms. Hategan.

15. Despite Ms. Sa’d’s promises, Ms. Hategan did not receive a cent of her share of the money. She was also not reimbursed for travel expenses after she accompanied Ms. Sa’d and her boyfriend on work-related trips, despite Ms. Sa’d having promised to do so, verbally and in writing (by text message). She was not even given the #Hategate tee-shirt that Sa’d promised she would receive – Sa’d made-to-order only one tee-shirt, which she wore during podcast interviews and media appearances.
16. Ms. Sa’d’s “love-bombing” of Elisa Hategan is documented in compliments and praise she texted her, and in Sa’d’s social media posts, including a glowing Amazon review she deleted the day after Elisa’s wrongful arrest. Less than 24 hours before Sa’d’s boyfriend, Adam Lee Wasserman, issued Ms. Sa’d the ultimatum to choose between him and the Plaintiff, demanding she block her or lose him, Sa’d had sent Elisa an endearing email, writing, *“After a lifetime of you fighting, it’s my turn for the heavy lifting. I wish we were of the timeline where we had private island and limitless credit cards. I hope those versions of ourselves realize how good they have it. But I also know that in another timeline, we never properly crossed paths and this connection never came to be. So I realize how good I have it.”*
17. On September 30, 2023, less than 24 hours after receiving Ms. Sa’d’s affectionate email, with no warning and without cause, Ms. Hategan was unexpectedly blocked on Sa’d’s social media accounts, cell phone, and email, by Sa’d’s boyfriend. It was the third time in a year that Wasserman had seized control of Ms. Sa’d’s devices and social media accounts to block Ms. Hategan; the previous two times took place when Wasserman had flown into a jealous rage after hacking private correspondence between the two women (June 2023), after he grew angry that they were text-messaging too much, and after Ms. Hategan had disobeyed his orders to delete social media posts he disapproved of.

18. An ex-convict with a history of uttering threats, Wasserman has a habit of seizing control of Ms. Sa'd's communications and issuing ultimatums. Ms. Hategan has witnessed Wasserman become verbally abusive to Sa'd, and to both of them, including an explosive outburst in a North Bay hotel room that left her shaken, and a mini-van ride from Peterborough where Wasserman had screamed in her face. In summer 2023, Ms. Hategan and Sa'd were forced to communicate behind Wasserman's back for two months, after he hacked into Sa'd's backup email and intercepted a confidential letter from Ms. Hategan, where she outlined concerns over privacy and Wasserman's controlling behaviour.
19. Wasserman jointly owns Sa'd's principal X/Twitter account @carymarules, and has unrestricted access to Sa'd's social media accounts and email addresses. As her law firm manager, he intercepts all phone calls that come into Sa'd's law practice, decides who they take on as clients, and has used Sa'd's law firm business email to send derogatory emails to Ms. Hategan. Hategan also believes he controls who Sa'd can communicate with on platforms and email addresses that bear her name.
20. Prior to engaging in a relationship with Ms. Sa'd in 2016 and becoming the manager of her law office, Wasserman operated the prostitution-related business Copycraigs, which enabled johns and sex workers to get hotel rooms without paying with credit cards. He then used bitcoin to buy the prostitution review board SP411.cc and became listed as its CEO, using the alias "Chase". SP411 was described in a February 2020 Toronto Life Magazine article as "The TripAdvisor of sex work". As its CEO, Wasserman was repeatedly accused of extorting, blackmailing, and threatening sex workers.
21. Originally a resident of Montreal, Wasserman moved to Toronto in or around 2007 or 2008. Prior to this move, he served multiple-year prison sentences in Quebec for theft, robbery with disguise, conspiracy to steal, criminal harassment, and uttering threats. The full extent of Wasserman's criminal record is not known to the Plaintiff.

22. On October 7, 2023, Wasserman published a defamatory Substack blog article under the monicker “The Gatekeeper”, which breached solicitor-client privilege and disclosed personal details about Ms. Hategan and Ms. Sa’d’s personal affairs and friendship. In his article, he admitted that he blocked Ms. Hategan and gave Sa’d the ultimatum to choose between him or Ms. Hategan, after describing his jealousy over their closeness and the fact that they had exchanged “I love yous”.
23. A week after being unexpectedly blocked, Ms. Hategan read the defamatory Gatekeeper article by Wasserman, and immediately emailed Sa’d in response to the plethora of false and libelous accusations it contained – specifically addressing Wasserman’s egregious lies about the Ritalin prescription medication Sa’d had convinced her to share. Ms. Hategan never received a reply – instead, Sa’d contacted police to report Ms. Hategan’s email as “criminal harassment”.
24. After her boyfriend abruptly blocked Ms. Hategan for the third time in a year, Ms. Sa’d responded to the Plaintiff only once, in a brief October 2, 2023 email. In this email, Sa’d apologizes for blocking her abruptly, but does not give her a reason why it happened. Sa’d simply states that she no longer wishes to work with Ms. Hategan (but does not dispute her co-authorship of The Hategate Affair) and wishes her the best. **Nowhere in the email does Sa’d instruct Elisa not to communicate with her, or tell her that her emails are unwanted.** Nor did she respond to questions about moneys owed, or the breach of confidentiality caused by Wasserman’s publication.
25. Ms. Sa’d BCC’d this October 2, 2023 email to MaryAnn Watson (“**Watson**”), a Victoria, BC resident described by Victoria police as suffering from “severe mental issues”. Watson immediately commenced a year-long harassment campaign targeting Ms. Hategan, which culminated in Watson threatening Ms. Hategan with violence by urging the public to carve swastikas into her face. In March 2024, Ms. Hategan reported the harassment and threats to York Regional Police.

26. Given their history of communicating behind Wasserman's back every time he threw a tantrum and seized control of Sa'd's accounts against both of their wills, Ms. Hategan had no reason to believe that this instance was different. She emailed Sa'd again, not knowing if Sa'd was getting her emails or if Wasserman was intercepting or deleting the messages.
27. Between September and November 2023, Ms. Hategan sent approx. 15 emails to Ms. Sa'd. The contents of those emails were predominantly related to: a) Wasserman's defamatory Substack blog article; b) questions about money and credit related to the articles co-authored by Ms. Hategan, which were still drawing money for Sa'd, and 3) questions about Sa'd's safety and Wasserman's control (i.e. are you okay, what's happening, are you getting my messages, are you seeing this, etc.) and reflections on their friendship. She never received a response, nor the money owed to her.
28. Ms. Hategan eventually came to realize that Ms. Sa'd defrauded her, with Sa'd making false promises and "love bombing" her as a way to elicit free labour for an entire year on the promise that she would eventually be compensated. What initially began as Ms. Hategan generously offering to write one favourable article about Ms. Sa'd, after Sa'd contributed \$100 to her legal costs fundraiser, turned into a year-long exploitation. In order to keep Ms. Hategan invested in labouring for her, Ms. Sa'd:
- 1) promised to help Ms. Hategan find a place to stay
 - 2) promised to temporarily sublet one of her vacant office spaces to Hategan at reduced cost
 - 3) promised to produce a podcast that would showcase Hategan's life story and correct factual errors in the lawsuit she had lost
 - 4) promised to help her and others deal with cyberbullying by taking legal measures
 - 5) promised to start a non-profit organization with Ms. Hategan in order to help her generate an income through grant-writing, public speaking, and fundraising campaigns, and
 - 6) promised to split "journalism" earnings with her.

None of Sa'd's promises came to fruition.

29. Ms. Sa'd's false promises, combined with affectionate exchanges, strung Ms. Hategan along for a year. Sa'd used Elisa not only as a ghostwriter and editor of articles, but as a mentor and personal advisor on a number of sensitive matters, fondly referring to her as "*my consigliere*". With Sa'd often calling her "brilliant" and using her as a sounding board in her quest to rebrand as a social media influencer and journalist, Elisa fielded Sa'd's worst ideas, advising her not to publish video footage captured by her boyfriend, who had filmed unsuspecting women from a distance, and to refrain from posting videos mocking a woman who had just been assaulted, or interviews with neo-Nazis.
30. Ms. Sa'd used Ms. Hategan's ideas and words (culled from her emails and text messages) beyond just utilizing them in articles that garnered GoFundMe and e-transfer donations for her ghostwritten "journalism". She also repurposed them for social media captions, and regurgitated Hategan's lines in podcast interviews. Then she enlisted Ms. Hategan to do research for her, to review and opine on various Libel Notices and Statements of Claim, and to help with a Law Society Bencher Campaign.
31. At the time Ms. Hategan realized she had been defrauded and robbed of her earnings, she did not know Wasserman's real name, nor that he had been convicted of robbery with disguise and conspiracy to steal, and stood accused of theft and robbery by others, including an ex-girlfriend who is convinced that he robbed her parents' house and stole her mother's jewelry. Despite not knowing his apparent history of threats and criminal harassment, Ms. Hategan feared for her safety – in January 2023, Wasserman had expressed a desire to harm one of Sa'd's critics.
32. Between 2022-2023, Ms. Hategan and Ms. Sa'd exchanged various text messages about Wasserman's relentless impulse for revenge against their critics, which included following them to protests across Ontario. In one September 23, 2023 iMessage to the Plaintiff, Ms. Sa'd wrote, "*Revenge is just the garnish for me. Lee could make it the whole course lol*".

33. Ms. Hategan's fear was compounded by the fact that she had knowledge of illicit activity conducted by Wasserman and Sa'd, which included stalking and harassing their critics (Sa'd sent Hategan videos of Wasserman photographing and filming female critics from a distance), and trespassing onto a suspected critic's property at 4 AM to film her house and vehicle – scarcely a harmless act given Wasserman's convictions and jailtime for robbery and criminal harassment.
34. In March 2024, Ms. Hategan reported Wasserman to York Regional Police, along with threats made by Sa'd's client MaryAnn Watson, a resident of Victoria, BC who incited the public to carve a swastika into Ms. Hategan's face. Watson appeared to work in concert with Sa'd and/or Wasserman, using her X account to cyberbully Hategan, going so far as to publish intimate details and facts that Hategan had communicated only to Sa'd, which were not posted anywhere on the internet.
35. Ms. Sa'd had confided to Ms. Hategan – in text messages – her decision to sue critics according to race and sex, for optics, sometimes without a cause of action, sometimes to extract “humiliation” or to ensure “libel chill” from her critics (in and around 2023 alone, Sa'd sued approx. ten people).
36. Ms. Sa'd also confessed to Ms Hategan that she wanted to enlist others in “a letter-writing campaign” to a critic's workplace in an attempt to have him fired, and told her that she had done it before. She also planned to ambush the same critic and his wife during a New Year's Eve dinner, in a plot to cause a public disturbance intended to ruin their memorable event. Ms. Hategan pleaded with Sa'd (in two emails and by phone) to refrain from carrying out a plan that could lead to mischief charges and LSO sanctions, before Sa'd ultimately relented. Sa'd initially filed a baseless peace bond application against the same critic, and thereafter sued him for defamation in Small Claims court, claiming the man was a threat because he operated libelous, anonymous sock puppet accounts critical of her. The matter was settled in June 2025, with Sa'd issuing a retraction that contained the admission that she had “caused harm” to the man and his wife.

37. Ms. Sa'd also convinced Ms. Hategan to share her Schedule III prescription medication, telling her that she had "undiagnosed ADHD". After Hategan shared her Ritalin with her, Sa'd was disappointed that Hategan had not been prescribed Adderall, and encouraged Hategan to go to her doctor and switch her prescription to Adderall, which Sa'd preferred, calling it an "upgrade" in text messages.
38. Starting in October 2023, soon after Wasserman and Sa'd blocked her without explanation and remuneration, Ms. Hategan began posting on her own X/Twitter page about her experience of being defrauded and exploited by Sa'd. She also wrote about Wasserman's unrestricted access to Sa'd's accounts, his hacking of private, solicitor-privileged correspondence, and of his volatile behaviour and control over Sa'd and her relationships. Nothing posted by Ms. Hategan was untrue.
39. Text messages between Ms. Sa'd and Ms. Hategan spanning 2022-2023, which include Sa'd's frank discussions of lawfare, stalking and scaring Sa'd's "enemies", and exchanges about the prescription drugs, corroborate Ms. Hategan's account and offer irrefutable evidence of Sa'd engaging in behaviour that would be certainly be considered "unbecoming" of her profession. If investigated, Ms. Hategan believes that Sa'd's actions would likely lead to her law license being permanently revoked.
40. On November 18, 2023, Ms. Hategan publicly announced that she planned to write a rebuttal to Wasserman's libelous Substack article. Ten days after, on November 29, she was contacted by 14 Division Toronto Police detective constable Diana Vigna ("**Vigna**"), Badge 82008, and informed that criminal harassment charges were being laid against her because she had purportedly disobeyed "multiple cautions and warnings" not to contact Caryma Sa'd.
41. Ms. Hategan has never received a single caution or warning telling her not to email Sa'd, who still owed her thousands of dollars, and whose boyfriend was actively spreading defamatory lies about Hategan. When Ms. Hategan attempted to tell DC Vigna that she was mistaken, Vigna 1) refused to believe anything other than what Sa'd had reported, and 2) refused to provide Hategan with evidence

that she broke the law, which indicated to Hategan that Vigna was negligent in her investigation since the “numerous cautions” she spoke of did not exist. Instead, Vigna argued with Hategan, insisting she had disobeyed “numerous, multiple cautions” and this was the reason for her arrest.

42. Ms. Hategan was formally charged with “criminal harassment” on December 10, 2023. In the video recording of her arrest, she can be seen asking DC Vigna if she ever laid eyes on evidence of those “numerous cautions and warnings”. Vigna, visible on AXON video, answers Hategan’s question (“May I ask, were you actually given any...actual evidence that I had been told anything?”) with an abrupt, “We have reasonable grounds to believe that. That’s why we’re charging you.” In fact, no reasonable grounds actually existed. Vigna then tells Ms. Hategan that she will receive all the “multiple cautions and warnings” in the disclosure from the Crown. Needless to say, no such evidence was produced.
43. The idea that Elisa had been “cautioned” was fabricated by Sa’d, whose false statements were automatically accepted as fact by 14 Division Toronto police, most likely because she is a lawyer, resulting in the negligent investigations that led to Ms. Hategan’s two wrongful arrests.
44. The Disclosure package, which Ms. Hategan received in spring 2024, shows that Ms. Sa’d lied to police numerous times, both on AXON Video and in writing; the lies included telling DC Vigna and other cops that Elisa had previously been cautioned by police. 14 Division police never fact-checked Sa’d’s lies, trusting her implicitly, presumably because of her profession. Many of the lies uttered by Sa’d on video are nearly-identical to lines in Wasserman’s Substack blog, leading Ms. Hategan to believe that Wasserman had coached Sa’d in what to tell police as a way to ensure Hategan would be wrongly arrested for a criminal charge Wasserman himself had been convicted and sent to prison for.
45. The majority of Ms. Sa’d’s lies to police are comprehensively refuted by Sa’d’s own text messages to Ms. Hategan, which offer verifiable evidence to the contrary, and historical records.

46. Ms. Hategan was released on her own recognizance with the condition not to contact Sa'd, whom she had not contacted since November 2023, either directly or indirectly. As a result of these conditions, Ms. Hategan was unable to make further requests for Sa'd to pay her the thousands of dollars that she was defrauded of, and was effectively prevented from suing Sa'd for fraud because it would be construed as "indirect contact" – all the while the Limitations Act clock ran down.
47. In June 2024, Ms. Hategan was again arrested by 14 Division police and charged with "Failure to comply", because Ms. Sa'd once again lied and convinced them that Ms. Hategan's public tweets – which were not directly addressed to Sa'd (both women had mutually blocked each other on social media) were in breach of Ms. Hategan's release condition not to contact Sa'd. Sa'd told police that Hategan social media posts *ABOUT* Sa'd were in breach, claiming they had been directed *TO* Sa'd. This is false. As usual, 14 Division police never investigated or fact-checked Sa'd's lies before charging Hategan on Sa'd's word alone, again exhibiting extreme prejudice in favour of Sa'd.
48. To ensure Ms. Hategan's second arrest, Ms. Sa'd pestered and pressured police for several months, and wrote a lengthy letter (approx. 60 pages) to DC Vigna, consisting of upwards of 100 particularized lies that were never fact-checked – including the outrageously false accusation that Ms. Hategan had committed hate crimes; was responsible for firebombings; engaged in criminal activity; posed a danger to Sa'd because Hategan is Jewish and Sa'd has Palestinian roots; "joked" about poisoning her office cats (an idea that Sa'd herself had invented, text-messed to Hategan, and used in false police reports filed against at least four innocent people); and other egregious lies contradicted by Sa'd's own text messages and historical archives.
49. Ms. Sa'd also told 14 Division police that Ms. Hategan had "slandered" her, and that she "gave confidential information to a third party" – after Hategan gave material evidence to a woman stalked by Wasserman, and agreed to appear as a witness against Sa'd in a civil lawsuit. After many months

of pestering and persuading multiple 14 Division cops, Sa'd finally convinced police to charge Ms. Hategan for a breach that never happened, despite the fact that alleged slander is not a criminal tort.

50. Sa'd further lied to police, claiming that she did not owe Ms. Hategan any money (despite having had extensive text and verbal discussions about splitting credit, donations, and other compensations for Ms. Hategan). Sa'd has earned thousands of dollars from work performed at least in part by Ms. Hategan, and as a result of her journalistic mentorship. Sa'd and Hategan's co-authored article *The Hategate Affair* was also uploaded to a website solely under Sa'd's control. The website (found at <https://dove-herring-wfpt.squarespace.com/> and linked to the domain "hategate.ca") was operational from September 12, 2023 until fall/winter 2024, and featured "Donation" and "Make a Donation" buttons from its inception until around January 2024. Ms. Hategan does not know the total amount of money collected by Sa'd through the website, through Sa'd's GoFundMe journalism-related pages, or via direct e-transfers to Sa'd's bank account and PayPal account, but strongly believes the figure is in the thousands of dollars.

51. Ms. Sa'd told police there was no solicitor-client confidentiality between them, despite the fact that:

- 1) Sa'd assured Hategan multiple times that their conversations were privileged and confidential
- 2) Sa'd assisted Hategan informally, providing brief, ad hoc advice and moral support in at least three separate legal matters, and
- 3) Sa'd reported Hategan to police for sharing "confidential information" that consisted of
 - a) incriminating text messages and stalking videos that Sa'd had sent to Hategan, which Hategan later shared with Jennifer Evans, a victim of Sa'd and Wasserman's stalking, and

b) text messages showing Sa'd's intent to write an anonymous, poison-pen article about Evans (who Sa'd had sued for defamation), which Sa'd published on Dean Blundell's Crier Media under the fake name "Elizabeth Simmons".

52. The information Ms. Hategan shared was NOT "confidential" nor "slanderous", but consisted of video and photographic evidence from Sa'd's own text messages, which showed her boyfriend, Adam Lee Wasserman, stalking a Toronto entrepreneur named Jennifer Evans ("**Evans**"). Sa'd had sued Evans for defamation in Small Claims Court because Evans had accused Sa'd and Wasserman of, among other things, criminal harassment and stalking. Ms. Hategan voluntarily shared with Evans proof of Wasserman's stalking (videos and photos Sa'd had texted to Hategan), and proof that Sa'd herself had authored the poison-pen defamatory article about Evans, all the while portraying herself as a victim being "harassed" by Evans. Such evidence would effectively destroy Sa'd's defamation case against Evans, who was correct to suspect that she had been stalked.
53. As usual, 14 Division police automatically believed Sa'd when she falsely claimed that Ms. Hategan had breached her conditions by giving incriminating evidence to Evans, who then posted it online. At that time, there were no conditions preventing Ms. Hategan from speaking ABOUT Sa'd to anyone. Ms. Evans' decision to publish the screenshots she received from Hategan (of Sa'd's text messages showing Wasserman's stalking) was also not unlawful or criminal. Still, Ms. Hategan was deprived of her liberty and incarcerated for an entire day, suffered bruises on her wrists from tight handcuffs, was forced to borrow tens of thousands of dollars to retain a lawyer, and was traumatized by her fifteen-month ordeal. When she asked police to explain what she had done wrong, a 14 Division detective (who did not identify himself by name) came to stand outside the cell where Ms. Hategan was locked up and shouted at her to "Stop posting about Caryma on Twitter!".
54. Ms. Hategan posting ABOUT what Sa'd had done to her, was not in breach of release conditions not to communicate WITH Sa'd. Nor was it a "breach" and "indirect communication", as Sa'd alleged,

for Ms. Hategan to tag the Law Society of Ontario (“LSO”), a regulatory body for lawyers, in her tweets on X, and to provide evidence of Wasserman’s stalking. Evidence that a woman was stalked by Sa’d’s boyfriend is neither “slander” nor “confidential information to a third party” that merited Hategan’s arrest, as cited in police reports she obtained through a Freedom of Information request after her charges were withdrawn.

55. In effect, Ms. Hategan was arrested twice, temporarily detained and incarcerated, forced to borrow tens of thousands of dollars she cannot repay, suffered extensive reputational damage and the obliteration of her career as a public speaker and journalist, was deprived of her Charter rights (her freedom of expression and liberty of movement were restricted), and experienced physical and mental suffering as punishment – all because she refused to be silent about having been defrauded by Sa’d, and because she became a defence witness for Jennifer Evans.
56. Sa’d’s actions – enabled by 14 Division Toronto Police’s complicity and negligence – contravene section 423.1 of the Canadian Criminal Code, specifically the law that governs intimidation of a witness; section 140 (mischief); section 139(2)(a) (obstruction); and s. 131(1) on perjury.
57. On the morning of January 16, 2025, Ms. Hategan was contacted by 14 Division police officer Jacob McNabb (“**McNabb**”) who left voicemails and sent an email instructing her to return his call immediately. Ms. Hategan’s lawyer, Megan Schwartzenruber, phoned him back since Ms. Hategan was experiencing a severe anxiety attack. McNabb informed Ms. Schwartzenruber that her client would be charged with two more counts of “fail to comply” – again, strictly based on Sa’d’s word.
58. A new breach charge raised the possibility, however slim, that Ms. Hategan – who didn’t have a surety – might not be released after surrendering to police. Ms. Hategan told her lawyer that she hadn’t done anything wrong and wasn’t going to surrender to police and risk being held in pre-trial custody – instead, she would jump off the Leaside Bridge on the morning she was scheduled to turn

herself in to 14 Division. Ms. Schwartzentruber pleaded with Elisa, trying her best to reason with her and reassuring her that she would do everything in her power to make sure that wouldn't happen.

59. When Ms. Schwartzentruber pressed McNabb for the reason behind the decision, he told her that Sa'd was calling them so frequently and complaining so much, they "had to do *something*". Clearly, the notion of telling her to stop calling 14 Division hadn't been entertained; charging someone to placate Caryma Sa'd seemed the preferable option. After an intense week (and an additional \$3000 in legal fees) where Elisa's lawyer presented McNabb with evidence showing she was innocent of Sa'd's baseless accusations, McNabb finally acknowledged, on the afternoon of January 24, that there were no grounds for Ms. Hategan to be charged criminally, and she "was not arrestable".
60. Ms. Hategan did not find out the full details of what led to this near-arrest until July 2025, when her Freedom of Information request to Toronto Police Services was finally fulfilled, after an inexplicable four-month delay and Ms. Hategan's escalation. The police reports show just how extensively Ms. Sa'd lied in attempts to have Ms. Hategan arrested for a third time. On Sa'd's word, McNabb wrote that he was "*satisfied with reasonable grounds that Hategan had breached her release order on two separate occasions, August 2024 and November 2024*" and that she operated a Twitter account called "Dreamer" and possibly other anonymous pages critical of Sa'd. None of it was true.
61. Ms. Hategan does NOT own, nor know, who runs the Dreamer/@Focustnv or the @SP411 accounts on X, yet Sa'd has falsely communicated to police that she is responsible for them – their only common denominator is that they have posted legitimate criticism of Sa'd on social media.
62. Ms. Hategan had long relinquished ownership of a domain she purchased for Sa'd two years earlier, as a favour – "carymasad.ca". After the dissolution of their friendship, she saw no reason to renew it. But nobody checked. A basic WHOIS search would have confirmed that the domain in question had transferred registrars. A simple production order would have confirmed that Ms. Hategan does not

publish any tweets from any other X/Twitter account except for her namesake @elisahategan. And yet, 14 Division cops were ready to charge her with TWO new counts of Failure to Comply, because Sa'd told them that "*NO ONE ELSE would have ownership of the website, ONLY THE ACCUSED*". And she was taken at her word again, as if a lawyer's word is tantamount to law.

63. **Ms. Sa'd has a clear and undeniable history of trying to have Ms. Hategan wrongly charged with "criminal harassment" – her last attempt nearly got Elisa arrested for operating anonymous social media accounts she does not operate, and owning internet domains she does not own.** Sa'd was nearly successful in convincing 14 Division cops to charge her for a third time based on groundless accusations not backed by any proof.
64. On January 27, 2025, three days after DC McNabb informed Ms. Sa'd that they would NOT charge Ms. Hategan for a third time, a furious Ms. Sa'd published the Plaintiff's photograph on Sa'd's @carymarules X page, along with the photos of 8 other individuals who had criticized Sa'd on the internet. The photo collage was accompanied by Sa'd's widely irrational conspiracy theory that Elisa was part of a "criminal element" and "coordinated" with other Sa'd "harassers" crisscrossing geographical time zones in a unified "hate campaign" to "incite hate and violence" against her.
65. Ms. Sa'd's libelous post is one of several where she indicates that she has been in communication with Toronto Police and their Hate Crimes Unit in efforts to report people for "criminal harassment" because they threatened her professional "reputation". Truth didn't appear to matter to Sa'd, who had confided to Hategan, both verbally and in DMs, her intention to of instill libel chill in her critics. Ms. Hategan believes that Sa'd's intention is to get at least one person charged criminally for operating a Twitter account negative of Sa'd, in order to send a chilling message to all of her critics: *if you dare bad-mouth me and my boyfriend/cameraman, I can/will have you arrested*. It is a testament to the power wielded by a lawyer's license that Ms. Sa'd has become emboldened to the point where she believes she can convince police that over a dozen people from all across Canada who criticized or

condemned her actions at any point over a four-year time span, are involved in a secret nationwide network devoted to “inciting hate and violence” against her.

66. On March 6, 2025, all charges against Ms. Hategan were officially withdrawn.
67. On March 7, Jennifer Evans publicly announced that Ms. Hategan would appear as a witness in the civil action between herself and Sa’d.
68. On March 10, 2025, Sa’d went to police again and perjured herself with a baseless 810 application for a peace bond against Ms. Hategan. The application was allowed to continue by the courts and police – presumably because of Sa’d’s law license and the veneer of credibility it conveys – despite the fact that by that time, Ms. Hategan had had no contact with Sa’d for nearly sixteen months.
69. Ms. Hategan had no idea that Ms. Sa’d had filed a peace bond application against her. She had not communicated with Sa’d since November 2023. She hadn’t been served with a summons either, before accidentally discovering her own name on the Ontario Courts docket just hours before the hearing was set to take place. On the evening of May 13, Ms. Hategan visited the website “ontariocourtdates.ca” and checked the next day’s Daily Court Lists, looking for Jennifer Evans’ name. Weeks earlier, Ms. Evans had told her that she believed Sa’d had filed a baseless peace bond application against her (although Evans had yet to be served). Ms. Hategan wanted to learn the courtroom number so she could attend by Zoom to support Evans. When she checked the docket, she was shocked to find her *own* name listed below Evans’.
70. On May 14, 2025, Sa’d’s baseless peace bond applications against both Ms. Hategan and Ms. Evans were thrown out of court by a judge within two minutes of the matter being brought before the courts.
71. On May 25, 2025, Ms. Sa’d’s boyfriend Adam Lee Wasserman was arrested by Peel Police and charged with obstruction of justice. A month earlier, in April 2025, Wasserman had been charged with assault over an incident where he is alleged to have assaulted a protester at a Mississauga rally. When

arrested, he gave police a false name (using his longstanding alias “Lee Stevenson”), a fake date of birth, and a “no fixed address”. The fact that an ex-convict – and the manager of Sa’d’s law firm – would so readily lie to police and give them a fake name to evade criminal charges, does not come as a surprise to Ms. Hategan, given how frequently Sa’d herself has lied to police.

72. Unable to locate “Stevenson”, Peel Police came to Ms. Hategan’s doorstep on the morning of April 22, 2025, reaching out for information because in March 2024 she had filed a police report about “Stevenson”. Ms. Hategan assisted Peel Police in the investigation and told them everything she knew. Wasserman’s criminal charges for assault and obstruction are currently before the courts.
73. Throughout her ordeal, Ms. Hategan was extremely affected by Sa’d’s conduct and the failure of 14 Division Toronto Police to investigate the false reports that led to her two wrongful charges and near-third arrest. Ms. Hategan has suffered from chronic depression since being diagnosed around age 20. She has been hospitalized for five previous suicide attempts, starting in her teens. Ms. Hategan’s wrongful arrests caused her to suffer from suicidal ideation, to engage in self-harming behaviour, and to experience insomnia and near-daily panic attacks that have continued into the present. She also suffered a recurrence of PTSD, a clinical diagnosis she received after her Heritage Front defection.
74. One of the 30 affidavits Ms. Hategan gave to the OPP in 1993 involved a Toronto 14 Division police officer who was a Heritage Front member and had attended KKK rallies in Arkansas. As a result of Hategan’s disclosure, he faced Police Act discreditable charges. That the same 14 Division was now behind her wrongful arrests brought back the PTSD, flashbacks, crippling fear and anxiety she had suffered in the 1990s.
75. For two years, Ms. Hategan had considered Sa’d her best friend and did not keep any secrets from her. As a result, she erred in confiding to Sa’d details about her phobia of police, rooted in her during her childhood in communist Romania and teenage years. In 2022, she told Sa’d – who had been

pressing her for details about the subject of her civil court gag order – that she did not want to violate the order, and that if she was ever arrested (despite not having a criminal record), she would kill herself. Armed with this knowledge, between 2023-2025 Ms. Sa'd contacted police numerous times, boldfaced lying as she redoubled her efforts to have Ms. Hategan arrested. Along with these false police reports, Sa'd called in no less than four separate "wellness checks" on Elisa, even at times when she hadn't said or done anything to merit such action.

76. Ms. Hategan has been traumatized by Sa'd's actions and Toronto police's complicity and unmerited, bizarre servility to Sa'd, which came at a cost of depriving Ms. Hategan of her Charter Rights. It is a servility all the more inexplicable because of how Sa'd and her boyfriend use Toronto police as props to advance her brand as an X/Twitter influencer. To that end, there is arguably no better example than what happened in January 2024, when Wasserman filmed a cop giving Tim Hortons Coffee to pro-Palestinian protesters. The video was clipped and spun to appear like Toronto cops were pro-Hamas, resulting in a groveling apology by Toronto police Chief Myron Demkiw and Sa'd's video going viral, resulting in more followers, donations, and Twitter ad revenue income for the pair.
77. It took Elisa many years to overcome her police phobia. Graduating *Magna cum Laude* from the University of Ottawa with a double major in criminology and psychology, she served as a consultant with the London, UK-based Institute for Strategic Dialogue (ISD), and has assisted law enforcement such as the Ontario Provincial Police with advice and training on preventing radicalization and extremism in youth. As a keynote speaker for the Probation Officers Association of Ontario (POAO), she presented workshops alongside OPP and RCMP officers. Her wrongful arrests and the high volume of false police reports Sa'd filed about her, which are still registered in CPIC, have destroyed her reputation in the law enforcement community.
78. In July 2025, Ms. Hategan filed complaints with the Law Enforcement Complaints Agency (LECA) about three 14 Division police officers involved in her wrongful prosecutions and near-third arrest.

She firmly believes that there is more than enough evidence for police to charge Sa'd with mischief, intimidation of a witness, obstruction, and perjury. Certainly much more than they had against Elisa before they became complicit in Caryma Sa'd's quest to silence her by any means necessary.

Ms. Sa'd's is Liable for her Wrongful Conduct

DEFAMATION

The False and Defamatory Statements

79. Ms. Sa'd has made and republished public statements about Ms. Hategan which contain false and defamatory statements that would reasonably be expected to lower her reputation in the eyes of the public, fellow journalists, and law enforcement.
80. Ms. Sa'd has communicated numerous false and defamatory statements about Ms. Hategan to Toronto Police, which resulted in Ms. Hategan's wrongful arrests and criminal charges being brought against her on two separate occasions. In March 2025, after an excruciating fifteen month-long ordeal and nearly \$30,000 in legal bills, all criminal charges against Ms. Hategan were withdrawn by the Crown.
81. Ms. Sa'd filed a baseless peace bond application against Ms. Hategan four days after Ms. Hategan's criminal charges were withdrawn by the Crown, and three days after she was formally named as a witness for the defence in a civil action initiated by Ms. Sa'd. Sa'd's unfounded application was thrown out of court at the Crown's request.
82. Between September 2023 and August 2025, Ms. Sa'd communicated and published the following false and defamatory statements about Ms. Hategan (collectively, the "**Defamatory Statements**"):

Verbal Statements to 14 Division Police, October 14, 2025, recorded on AXON Bodycam Video

- a) "And today DC Vigna was back from vacation, like she was – not vacation, she was off for a few days – and so she's the one who made this new call number and said, Provide officers the details,

like show them the actual material, and then from there **we'll decide if this is another caution, if this is charges**, if this is...you know."

- b) *[In response to police officer asking if boyfriend is involved in the "fallout" of our relationship]:*
"He was not. No. Nope. No. He doesn't wanna be involved in any of this. He's more of a pacifist than me."
- c) "It's concerning because she references a "revenge plot" that she thinks I have against her."
- d) "We have very extensive like text messages, DMs...this was someone who I thought was a confidante. Um....so, you know, I...I stand behind my words generally, but speak differently in public than I do in private. So **she's just privy to information that she thinks could hurt me**"
- e) **When we initially connected, it was regarding a court case that she had been through.** An outcome of that case was a very strict injunction slash restraining order, that prevented her from speaking about this other woman, referring to her, etcetera etcetera – except in the case of, you know, privileged conversations. **So that is how we initially connected.** And then developed a friendship – I would even say a "trauma bond" from there, because we've been harassed by some of the same people. Umm... So...you know, and that's partly why I'm not discussing this publicly – because... just out of an abundance of caution. Even though the majority of our conversations wouldn't be confidential or privileged, I...I just... why touch that, right? But **she's...sort of weaponizing that against me.** To say that, like, I can't talk about it. Which...may or may not be true. But I'm not talking about it anyway. But **she thinks she has me by the neck**, in that sense."
- f) "So this is where **she started leaking stuff**, right on the 30th or the 1st."
- g) "Part of this campaign is also **galvanizing my existing sort of cohort of harassers.** Which is a weird thing to say...I have that because of the nature of some of my work, and I actually have active police reports, or sorry, police files. In one case a peace bond, pending against some of the individuals who she's interacting with here. But also just **turning sorta random people against me.** When you get to the very end, **you'll see just samples of DMs that she's been sending to people about me, portraying me as a victim of abuse. Like, just untrue things that serve her interest of just...delegitimizing who I am and what I do.**"
- h) *[In response to Cop asking, "What is it exactly would you like us to convey to DC Vigna?"]:* **"That the caution didn't work. I don't think that she...took it seriously.** I know that she is capable of

following judicial orders, and in particular restraining orders or sorta injunctions. Uh....and that her....it's not abating. I thought that, **like we're now almost a week out, or almost 10 days out actually, from when I...when that caution was issued, and it's been daily.** Every single day there's references to me, messages directed at me, you know the email that was the one time, and...and this threat of more is coming, more to come. And it's....it's...very unsettling.”

- i) **“I’m concerned that this puts a particular target on my back. She’s Jewish, I’m Palestinian...** Like, she’s referring to the conflict, and then it’s me, and then it’s you know about Gaza, and then it’s a picture of me... and it’s just...I don’t know what the end game is here. I don’t know what she wants from me. But I want nothing from her, nothing to do with her. And so I...you know...I...**I feel scared. I feel scared about what she’s capable of.**”
- j) *[In response to Cop question: “And what is she capable of?”]* “In the nineties, she was a very prominent member of the Heritage Front, so that’s like a **neo-Nazi** organization that...Canada’s preeminent neo-Nazi organization. And she defected from that group, and **I took it at face value that a defection meant...refuting all of those ideas and ideologies.** I know that when she was with the group, she was involved in harassment campaigns, she talks very openly about this in her book, in sorta speeches she’s given, and things that we’ve discussed. So I know that she sorta has that technical skillset, and she has carried that out in the past. **I know that she has this injunction and restraining order, so there’s this pattern of behaviour.**”
- k) “With the Heritage Front, I don’t know...I can’t say whether she was ever involved in incidents of violence or anything like that, I don’t know, but just like...**I don’t know what she’s capable of.**”
- l) “I do feel in some ways that **I was targeted by her. And specifically sought out because of my profile, because of the work that I was doing as kind of a vehicle to get her story out there.**”
- m) **“She’s done, or been involved with, dangerous stuff, her whole life.”**
- n) *[In response to Cop question: “Since the last report, since October 4th, has she made any threats at you?”]* “The email that I initially showed you...umm....and a couple of tweets...**kinda alluding to, not physical threats but threats to my reputation, threats to my professional standing, threats to disclose personal or sensitive information.** And I don’t know specifically what she’s referring to. **But that’s kind of like the...the looming threat.**”

- o) [In response to Cop question: "Now, are you afraid for your physical safety?"] **"Yeah. Yeah. She knows where I spend my time, she knows that like my cats are here. Alone.** If I'm not physically in the office and you know, the door is closed, but it's not like....you could get...like...open it like...even when it's locked, **you could kinda slip something in there....like,** she knows that that's something I'm anxious about. **She's joked about like, someone coming for my cats before, right? So I don't know if that's something she might actually execute."**
- p) **"There is incitement against me. Based on what she's saying, how she's portraying herself as victim...** You know, I got so much flack for doing a wellness check. Even though...and people don't know this because I wasn't saying it, but even though I was like... "I'm going to kill myself next week" and she has previously told me *how* she would do it, you know, *where* she would do it...like, so... **I had to do a wellness check.** And...countless people, like countless real people [saying] "Caryma's weaponizing the court system, she's using the police as her personal security..." like, and it's not true. And that's just like **one example of her whipping up this frenzy against me"**
- q) "You know, other times I've had to call police it's because of...the protesters, who don't like what I'm doing. And you know, some cross the line into like...just like crossed the line. **But this is the first time I've faced this kind of betrayal. Um...and been so compromised or vulnerable.** Because we spoke all the time, right?"
- r) "And now, as well, **I see all of her talk about suicide** in a different light, where... I realize that...like, **there is manipulation at play.** And that's not to say that she isn't actually suicidal, but you know she talked about it a lot and in detail, and...I didn't appreciate in the moment that, it was having an emotional effect on me as well. In the way that I would sorta relate to, or coddle, or you know, I'm gonna say what you want to hear, right?...In I think the email on October 10, she says, you know, "I'm not suicidal now like I was last week" – but the reference to last week is when I was making these wellness checks, and she would tell officers, "I'm not suicidal, like, you know, she doesn't know what she's talking about." So it's like, were you or weren't you – I don't know, but like, **you can't control me by using...leveraging that as a threat"**
- s) **"In a perfect world, she's not talking about me at all.** Because I'm not talking about her, and I want to sever this, and that's that. You know, I probably would need to get an injunction for that, right? But to be...like, to the extent that no direct or indirect contact...**and I think indirect contact should be a bit more broadly construed, knowing that..."**

Emails to 14 Division Toronto Police, October 2023 – June 2024

Email to police, October 10, 2023

- a) “**Elisa Hategan continues to communicate directly with me on social media, despite the issuance of a caution.** She continues to fixate on my partner and portrays him in a false, negative light. Her tone ranges from desperate to demanding. **I have not unblocked Ms. Hategan at any point.** She is naming and tagging me even though I have made it clear that I wish to be left alone. I am concerned that **she is ignoring the caution issued by police.**”

7-Page Letter to police on legal stationary, May 28, 2024

- b) “Dear D.C. Vigna, Please find attached information for your consideration with respect to **Elisa Hategan's ongoing criminal harassment.** I apologize for the delay in getting this to you. As you can see, there has been a lot of activity since her arrest on December 10, 2023. It took a major physical and emotional toll to go through her feed and categorize the range of attacks against me. I cannot emphasize enough how **terrifying it is to be the object of fixation for a former confidante who is now hell bent on ruining my life.**”
- c) “**Since her arrest, HATEGAN has fixated on me.** She attended the University of Toronto protest encampment **where I was known to be working and conveyed a threatening message to me through a third party.**”
- d) “She posted approximately 138 **derogatory** tweets that refer directly or indirectly to me, my partner, and/or my clients. This does not include hundreds of reposts to amplify her own content. **One tweet was direct communication and approximately 20 tweets constitute indirect communication.**”
- e) “Her online activity focuses almost exclusively on her **obsession** with me.”
- f) “**HATEGAN has a long history of harassing private citizens.**”
- g) “**HATEGAN intended to use me as a proxy** to ruin her former best friend. When that failed, **she turned her attention to harassing me,** instead. I do not believe she will stop on her own without police intervention.”
- h) “**HATEGAN’s ongoing actions constitute a sustained campaign of criminal harassment through false allegations, manipulation, threats, and the use of third parties.** Her behaviour

reflects a pattern of toxic emotional dependence, stalking, intimidation, and misrepresentations/lies aimed at damaging my personal and professional reputation and inciting others to harass me.”

- i) “The case against her was withdrawn around the time she agreed to testify against her former associates.”
- j) “There are reasons to question whether [her Jewish] conversion was made in good faith.”
- k) **“Previous Criminality: Involved in hate crimes and harassment campaigns.”**
- l) **“[Participated in] Unsolved case involving a group home firebombed by the Heritage Front.”**
- m) Pattern of Behaviour: Forms toxic, obsessive relationships and spreads unfounded allegations and conspiracy theories.
- n) **“Ingratiated herself with me to get me to enact vengeance by proxy on her former best friend. Reached out under the pretext of not being restricted by the injunction** because she is permitted to discuss her case with counsel.”
- o) **“Wanted to use my platform to circumvent the injunction. She wanted me to produce a podcast** highlighting inconsistencies with [REDACTED]’s life story, with the aim of ruining her reputation.”
- p) **“Breach of Non-Communication Order – Direct Communication: On December 12, 2023, HATEGAN replied directly to me despite being blocked. She circumvented being blocked by posting under another account** within a thread.”
- q) **“Indirect Communication: Tagged the Law Society of Ontario (LSO) in fifteen tweets with false and salacious accusations against me, despite acknowledging she cannot or should not file a formal complaint while her charges are pending. HATEGAN is aware that I have** previously been required to respond to an LSO complaint based on tweets tagging the regulator.”
- r) **“Tagged my professional contacts, including LISA LAFLAMME, DEAN BLUNDELL, and CRIER MEDIA, in five tweets hoping they will address her allegations with me. Prior to her arrest, she communicated with BLUNDELL via direct message on X”**

Dean Blundell is also Ms. Hategan’s colleague. In January 2023 he offered her a CRIER MEDIA contract, which she opted not to sign but collaborate to Crier on an ad hoc basis.

- s) “On May 7, 2024, after my footage of the University of Toronto’s People’s Circle for Palestine encampment went viral, **she visited the campus and spread false rumours and salacious rumours to another journalist, DAVID MENZIES. On May 8, 2024, MENZIES informed me that she threatened to retaliate once her charges are dropped. This was conveyed as, “She said you should know she will get you back.”** I have been anxious about reporting at the encampment since her attendance.”
- t) On May 20, 2024, CATHERINE CROCKETT posted on Mastodon about HATEGAN seeking out GISELA MCKAY at the University of Toronto’s People’s Circle for Palestine encampment. Both CROCKETT and MCKAY are perpetual protesters who HATEGAN knows have been harassing me since July 2021. MCKAY has rallied encampment protesters to accost me and my partner with signs that repeat HATEGAN’S salacious conspiracy theories about us.”
- u) “**Ongoing Criminal Harassment – HATEGAN responded to being charged with criminal harassment by spreading lies and half-truths to manipulate others and sway public opinion against me. This itself is harassment”**
- v) “Misrepresentation and False Allegations:
- **Exaggerates her influence on me.**
 - **Claims ownership of my project** that she was invited to join.
 - **Claims I owe her money.**
 - **Accuses me of lying to police and filing a false report.**
 - Blames me for her old name appearing on charging documents.
 - Claims conspiracy with the crown and police.
 - Accuses me of spoofing her phone number.
 - **Accuses me of inciting others to defame her.**
 - **Accuses me of malicious wellness checks.**
 - **Accuses my partner of intercepting my communications.**
 - **Accuses my partner of running an anonymous account.”**

w) **“Obsessive, Manipulative, and Threatening Behaviour:**

- **Tracks my social media activity, including deleted reviews and retweets.**
- **Posts photos and videos imitating my actions or locations.**
- **Publishes private conversations and documents and threatens to release more.**
- **Hints at lengthy affidavits to expose my personal information.**
- **Posts cryptic, intimidating messages targeting me and my partner.**
- **Fabricates conspiracy theories to portray me as conspiring with police and the Crown, and my partner as an abusive pimp.”**

x) **“Use of Third Parties:**

- **Shared my mother’s home address with JOHN THIBEAU and is working with him** to try and identify my partner, who they wrongly believe is named ADAM WATSON.
- **Shared partial DMs with DEANA SHERIF, as well as a twelve-year-old article** which has been misrepresented online to falsely suggest that I am antisemitic.
- **Shared partial DMs with JENNIFER EVANS,** which have been published online to falsely suggest that I engage in stalking and harassment.”

y) **“Harassment of Third Parties:**

- **Targets my client MARYANN WATSON,** who made a police report about HATEGAN’S suicide threats and harassing behaviour prior to HATEGAN being criminally charged.
- **Posts references to her former address and is searching for current address.**
- **Sends threatening messages to her family.**
- **There were concerns that HATEGAN would crash the recent funeral of WATSON’S Holocaust survivor mother-in-law,** who endured five work camps including Auschwitz. WATSON’S name was not included in the obituary as a precaution.
- **HATEGAN has access to Jewish directories** through her conversion and speaking gigs at synagogues.”

- z) **“Since being arrested, HATEGAN posted approximately 138 derogatory tweets that refer directly or indirectly to me, my partner, and/or my clients, including direct communication (one tweet) and indirect communication (approximately 20 tweets).”**
- aa) **“HATETGAN (sic) also showed up at a location where I was known to be working and sought out third parties for the purpose of disparaging me. One individual subsequently conveyed her message to me.”**
- bb) **“HATEGAN fits the profile of a stalker with severe personality disorders. She demonstrates an exaggerated feeling of self-worth and an obsessive desire for other people to admire and revere her. She also exhibits extreme dependence in her need for constant help, attention, and acceptance from others, as well as a high sensitivity to rejection and abandonment. Her pattern of behaviour includes hyper intimacy, cyber stalking, surveillance, harassment and intimidation, and coercion and threats.”**
- cc) **“I genuinely fear she may escalate to physical aggression.”**
- dd) **“The impact of HATEGAN’s stalking has caused me significant anxiety, distress, and a sense of powerlessness. Her attacks have disrupted my personal and professional life. Her collaboration with other online harassers involves disseminating my mother’s address and targeting one of my clients.**
- ee) **“She is actively fabricating conspiracies that put me and my partner at risk of physical harm at protests.”**
- ff) **“I also carry a lot of stress about third parties being harassed by HATEGAN due to their actual or perceived proximity to me, including my client whose name was omitted from her mother-in-law’s obituary to minimize risk of the funeral being crashed.”**
- gg) **“The severity of ongoing harassment highlights the need for additional charges, as well as conditions not to frequent anywhere I work, live, or am known to be.”**

47-Page Document containing 139 Items Chart – attached to May 28, 2024 7-Page Email

- hh) Chart item #2 – **“HATEGAN initially reached out to DEAN BLUNDELL, asking him to put us in touch. HATEGAN asked me to listen to her story in my capacity as a lawyer so she would not be limited by the Superior Court injunction. HATEGAN spewed her entire**

history with [REDACTED], whose name was not familiar to me at that point. I did not provide any advice on appealing her civil loss. Shares private information; Retribution against [REDACTED]; Projects desire for vengeance”

- ii) Chart Item # 4, 6, 7, 23 – “HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.”
- jj) Chart Item #5 – “**HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction. Retribution** against [REDACTED]”
- kk) Chart Item #8 – “**HATEGAN falsely claims to have advised against engaging in troubling acts, suggesting that the ideas were serious, when they were not.** Shares private information; Projects **desire for vengeance**; False claim – miscellaneous”
- ll) Chart Item #9 – “**HATEGAN misrepresents serving documents as “stalking.” HATEGAN exaggerates her influence. Shares private information; Projects desire for vengeance; Exaggerates her influence; Expresses contempt for my partner”**
- mm) Chart Item #10 – “**HATEGAN falsely implies she is owed money.** Less than \$1,000 was collected in donations specific to the HateGate Affair, which was spent on illustrations, advertising, website hosting, and a celebratory dinner. **Claims ownership of HateGate; Claims money is owed”**
- nn) Chart Item #11 – “**HATEGAN exaggerates her influence. Contrary to HATEGAN's portrayal, engagement in “Twitter battles” and conflict was not a primary focus. Most of my effort went into documenting protests, with such coverage routinely making the news. HATEGAN tried unsuccessfully to discourage me from attending rallies. Shares private information; Projects desire for vengeance; Exaggerates her influence”**
- oo) Chart Item #16 – “The account she highlights as suicide-baiting her is operated by JOHN THIBEAU, who she now passes information to for the purpose of harassing me and my family.”
- pp) Chart Items #14, #24, #38, #43, #54 – “**HATEGAN falsely implies she is owed money.”**
- qq) Chart Items # 17, 20 – “**HATEGAN engages in coercive control with reference to suicide. Shares private information; Coercive control; Expresses contempt for my partner”**

- rr) Chart Items #21, #22, #25 – **“It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. Expresses contempt for my partner”**
- ss) Chart Item #26 – **“Coercive control; Collaborates with my harassers”**
- tt) Chart Item #28 – “HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.” Projects desire for vengeance; Conspiracy; False claim – miscellaneous”
- uu) Chart Item #29 – **“It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. Nor does my partner control my law practice. HATEGAN is referring to a 14-page letter that was, in fact, a jealous hit piece against my partner. Expresses contempt for my partner”**
- vv) Chart Item #32 – **“HATEGAN makes it clear that she stalks my online activity. Stalking; Expresses contempt for my partner”**
- ww) Chart Item #35 – **“HATEGAN claiming ownership over my project** that I invited her to join. HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree. Shares private information. **Claims ownership of HateGate; Toxic dependency”**
- xx) Chart Item #38 – **“HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely implies she is owed money. It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me** through my professional regulator. Claims money is owed; Conspiracy; Indirect communication – LSO”
- yy) Chart Item #39 – **“HATEGAN claiming ownership over my project** that I invited her to join. HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree. **This is direct communication because HATEGAN’S tweet is in response to one of my own threads. She circumvented being blocked from my profile by replying to another account (possibly her own alternate account) in the thread,** but her reply tagged me. Claims ownership of HateGate; Toxic dependency; Direct communication”

- zz) Chart Item #43 – “HATEGAN **claiming ownership over my project** that I invited her to join. **HATEGAN falsely implies she is owed money.**” “It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. HATEGAN falsely accuses me of filing a false police report. HATEGAN engages in coercive control with reference to suicide. Claims money is owed; Claims false police report; Claims ownership of HateGate. Toxic dependency; Expresses contempt for my partner; Conspiracy; Coercive control”
- aaa) Chart Item #44 – “HATEGAN **claiming ownership over my project** that I invited her to join. HATEGAN tags LAFLAMME, presumably to have her reach out to one or both of us about this situation. **Claims ownership of HateGate; Indirect communication** – colleague”
- bbb) Location Chart Item #45 – “HATEGAN employs self-deprecation to garner sympathy while subtly boasting about catching the attention of LAFLAMME. This is a **calculated attempt to ruin my professional relationship with LAFLAMME. Indirect communication** – colleague”
- ccc) Chart Item #47 – “HATEGAN falsely accuses me of filing a false police report. I had several conversations with DETECTIVE UMBRELLO about whether HATEGAN knew or ought to have known her repeated attempts to communicate were unwelcome, including that **Toronto Police advised they issued HATEGAN a caution to stop contacting me. It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.** HATEGAN responds to being charged with criminal harassment by **broadcasting lies and half-truths to sway public opinion against me, as well as threats to retaliate. This is harassment in and of itself [...].** Claims false police report; Expresses contempt for my partner; Conspiracy Charges; Coercive control”
- ddd) Chart Item #55 – “Attached screenshot is a list of articles where HATEGAN provided input. **Everything was published in my name because 1) I was the primary author, and 2)** HATEGAN explicitly did not want to be named because she claimed she could not withstand any negative attention. HATEGAN asks my readers and supporters to contact her. Solicits my followers”
- eee) Chart Item #56 – “I have never communicated directly or indirectly with HARRISON about HATEGEN (sic) apart from him sharing his DMs with her where she was ranting and **spreading falsehoods** about me. **Projects desire for vengeance; False claim**”

- fff) Chart Item # 57 – “HATEGAN QTs herself soliciting contact from anyone who has ever read **my work. Shares private information; Solicits my followers**”
- ggg) Chart Item #60 – “Attached screenshot is a Word document with extensive list of false allegations. **Conspiracy SeriousMother; Claims ownership of HateGate; Claims money is owed; Projects desire for vengeance**”
- hhh) Chart Item #62 – “HATEGAN wanted to do speaking tours at synagogues, mosques, and churches together. She referred to this plan numerous times in her unwanted correspondence towards me, especially after Hamas attacked Israel on October 7, 2023. I was never keen on this idea because it made me **feel tokenized. Toxic dependency**”
- iii) Chart Item 64 – “**HATEGAN makes an implied threat to doxx my partner’s name. Projects desire for vengeance.** Rewriting her story”
- jjj) Chart Item #65 – “HATEGAN falsely accuses my partner of running @seriousmother. **HATEGAN admits to digging up a twelve-year-old article about me that she circulated among my online harassers (DEANA SHERIF, JOHN THIBEAU, BRETT STEWART) to smear me as antisemitic. That article was sent to JOHN MOORE to try and get me kicked off his radio show as a contributor. Stalking; Collaborates with my harassers; Rewriting her story**”
- kkk) Chart Item #66 – “HATEGAN acknowledges that @seriousmother has been linked to MARYANN WATSON yet falsely implies my partner runs the account. **Harasses third party – client**”.
- lll) Chart Item #67 – “HATEGAN gets upset if anyone does not take her portrayal of her life story at face value. HATEGAN is rebutting @seriousmother, whose research suggests discrepancies in HATEGAN’S version of events. [...] HATEGAN’S threat to go to police indicates she feels harassed by having others talk about her, meanwhile she persists in posting about me. The key difference is that **@seriousmother relies on verifiable public information**, whereas HATEGAN fabricates salacious conspiracies.”
- mmm) Chart Item #68 – “HATEGAN falsely accuses my partner of running @seriousmother. To my observation, **@seriousmother has not made any physical threats towards HATEGAN or anyone else.** Rewriting her story; False claim; Expresses contempt for my partner”

- nnn) Chart Item #70 – “HATEGAN **hints at doxxing my client** MARYANN WATSON. HATEGAN falsely accuses my partner of running @seriousmother. Harasses third party – client”
- ooo) Chart Item #72 – “HATEGAN falsely accuses my partner of running @seriousmother. My partner is Jewish and does not engage in antisemitism or hate crimes. By contrast, HATEGAN has been charged with hate crimes in relation to her time with the Heritage Front. HATEGAN is projecting about who **belongs in jail**. False claim – miscellaneous; Expresses contempt for my partner”
- ppp) Chart Item #73 – “HATEGAN falsely accuses my partner of running @seriousmother. HATEGAN has privately **expressed serious and disturbing disdain towards Jewish people and Judaism**. For example, on Yom Kippur she made it a point to violate each of the five prohibitions and explicitly did not keep kosher. False claim – miscellaneous”
- qqq) Chart Item #74 – “HATEGAN falsely accuses my partner of running “MAW [MARYANN WATSON] is fail at everything” account. Conspiracy; Harasses third party – client”
- rrr) Chart Item #75 – “HATEGAN **falsely suggests she is in physical danger from me or my partner**. HATEGAN refers to us having dinner together with SHERIF FODA and **attributes statements to him that were never made**. False claim – miscellaneous; Expresses contempt for my partner”
- sss) Chart Item #77 – “Leading up to this, HATEGAN contacted my client MARYANN WATSON’S family members (husband and son) **threatening criminal and civil consequences if the account @seriousmother did not delete its posts questioning the veracity** of HATEGAN’S life story as recounted by her. HATEGAN has falsely accused my partner of running @seriousmother. **Harasses third party – client”**
- ttt) Chart Item #78 – “Harassing 3rd party; HATEGAN **claiming ownership over my project** that I invited her to join. Claims ownership of HateGate”
- uuu) Chart Item #80, #81 – “HATEGAN’S allegations are delusional but clearly meant to refer to me. For the record, my phone is not cloned; **my partner does not hack my privileged correspondence; HATEGAN is referring to a 14-page letter that was, in fact, a jealous hit piece against my partner; my partner is not cyberstalking HATEGAN; my partner did not disclose any secret conversations and does not run a defamatory blog**. Expresses contempt for my partner; Indirect communication – colleague; Conspiracy”

- vvv) Chart Item #82 – “HATEGAN **falsely implies she is owed money** for editing articles.
HATEGAN tags CRIER MEDIA, presumably to have them reach out to one or both of us about this situation. **Claims money is owed; Indirect communication – colleague**
Dean Blundell is also Ms. Hategan’s colleague. In January 2023 he offered her a CRIER MEDIA contract, which she opted not to sign but collaborate to Crier on an ad hoc basis.
- www) Chart Item #83 – “HATEGAN falsely accuses me of depriving her of “thousands of dollars in donations.”
- xxx) Chart Item #84 – “HATEGAN is aware that Garbage is one of my favourite bands and the lyrics seem to reflect her warped perception of me.”
- yy) Chart Item # 85 – “Bitter subtweet; Stalking; Exaggerates her influence”
- zzz) Chart Item #87, 116 117, 118, 135, 136 – “3rd party pile on”
- aaaa) Chart Item # 88, 89, 90 – “Harassing 3rd party; Claims ownership of HateGate; Harasses third party – follower. HATEGAN claiming ownership over my project that I invited her to join and trying to pressure a stranger into deleting his tweet that mentions me.”
- bbbb) Chart Item #91 – “**Imposter syndrome on Purim; Attached selfie is HATEGAN in a bright pink shirt. This was posted after I shared footage of myself** at a Barbie-themed Purim party, for which I was dressed in bright pink. **Stalking**”
- cccc) Chart Item #93 and #94 – “Cryptic messaging; Attached photo depicts a solar eclipse. The meaning of this cryptic tweet was not initially clear, but **HATEGAN subsequently released a salacious conspiracy thread on the date of the eclipse (April 8, 2024)**. Cryptic messaging; Fiat iustitia et pereat mundus. Latin translation: Let justice be done, though the world perish. **Cryptic message that seems intended to intimidate.**”
- dddd) Chart Item #95 – “Blocked by Dean. HATEGAN disparages my professional contact DEAN BLUNDELL, suggesting she was treated unfairly because of his loyalties to me. “Pinned thread” refers to her tweets about The Lawyer Next Door. False claim – miscellaneous. **Harasses third party – colleague**
Dean Blundell is also Ms. Hategan’s colleague. In January 2023 he offered her a CRIER MEDIA contract, which she opted not to sign but collaborate to Crier on an ad hoc basis.

- eeee) Chart Item #96 – “Cryptic message; The clue is **the name ADAM WATSON. I have no knowledge of this person.** JOHN THIBEAU made posts that led me to discover WATSON has apparently listed my mother’s home address as his address on articles of incorporation. **HATEGAN and THIBEAU appear to be working together to stalk my mom. Stalking; Collaborates with my harassers”**
- ffff) Chart Item #98 – “HATEGAN falsely accuses me of filing a false police report.”
- gggg) Chart Item #99 [*Re. tweet describing Wasserman’s ownership of SP411.cc and Copycraigs*] – “Conspiracy; HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.” Projects desire for vengeance; False claim – miscellaneous”
- hhhh) Chart Item #100 – “Conspiracy; HATEGAN falsely accuses me of filing a false police report. HATEGAN tags LAW SOCIETY OF ONTARIO. **This is indirect communication** because her intent is to communicate with me through my professional regulator. HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.” Conspiracy; **Claims false police report; Indirect communication – LSO; Maligns Crown”**
- iiii) Chart Item #101 – “HATEGAN **falsely states she is owed money. Conspiracy; Claims money is owed; Maligns Crown”**
- jjjj) Chart Item # 102, 103, 104, 105, 106, 110 – “Conspiracy; HATEGAN **falsely states she is owed money. It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.** HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.” HATEGAN tags LAW SOCIETY OF ONTARIO. This is **indirect communication because her intent is to communicate with me through my professional regulator. Claims money is owed; Expresses contempt for my partner; Conspiracy; Indirect communication – LSO”**
- kkkk) Chart Item #108 – “HATEGAN falsely accuses me of filing a false police report.
- llll) Chart Item # 112, 113 – “HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree. **HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction.”**

- mmmm) Chart Item # 114, 115 – “Attached screenshot is a from Word document. **HATEGAN recounts a conversation at dinner with SHERIF FODA that is completely fabricated. FODA did not make any comments about Law Society discipline processes**, nor did he provide HATEGAN legal advice. **HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction.**” *Ms. Hategan is willing to undertake a polygraph to recount that evening’s conversation. She also has a contemporaneous journal entry written that night.*
- nnnn) Chart Item # 116 – “**HATEGAN claiming ownership over my project** that I invited her to join.”
- oooo) Chart Item #119 “**HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me** through my professional regulator. Claims money is owed; Indirect communication – LSO”
- pppp) Chart Item #120 and #121 – “**HATEGAN claiming ownership over my project** that I invited her to join. **HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money. Harassing 3rd party; Claims money is owed; Claims false police report; Claims ownership of HateGate**”
- qqqq) Chart Item #122, #124 – “**HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money. HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.” HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator. Harassing 3rd party; Claims money is owed; Claims false police report; Claims ownership of HateGate; Conspiracy; Indirect communication – LSO**”
- rrrr) Chart Item #125 – “**HATEGAN claiming ownership over my project** that I invited her to join. **HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money. Harassing 3rd party; Claims money is owed; Claims false police report; Claims ownership of HateGate; Solicits donations**”
- ssss) Chart Item #126 – “**HATEGAN falsely states she is owed money. Claims money is owed; Harasses third party – follower**” – *Hategan simply asked for X users to inform her if they had donated money after the publication of the Hategate Affair, and what amount*

- tttt) Chart Item #127 – “**HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely implies she is owed money. Claims money is owed. Defrauded; Claims false police report; Claims ownership of HateGate**”
- uuuu) Chart Item #129 – “**HATEGAN falsely implies she is owed money. Defrauded.**”
- vvvv) Chart Item #131 – “**Attached selfie was taken at the University of Toronto and posted on my birthday.** I have been documenting the campus encampment since May 2, 2024. This was made public on my social media posts, and my footage being featured by mainstream outlets. HATEGAN attended on May 7, 2024. **She approached DAVID MENZIES to spread false and salacious rumours about me. She told him I should know that she would “Get me back”** once her charges were withdrawn. MENZIES conveyed this message to me on May 8, 2024.”
- www) Chart Item # 133, 134 – “**HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money.**”
- xxxx) Chart Item #137 – “**HATEGAN appears to be hunting WATSON. Stalking; Expresses contempt for my partner; Harasses third party – client**”
- yyyy) Chart Item #138 – “**Attached video of squirrel appears to be filmed at the University of Toronto.** I have been documenting the campus encampment since May 2, 2024. This was made public on my social media posts, and my footage being featured by mainstream outlets. HATEGAN is making indirect reference **to one of my viral videos** which featured a boy trying to lure squirrels with nuts. Stalking”
- zzzz) **EMAIL TO POLICE dated June 5, 2024**
“**Elisa Hategan has just engaged in more indirect communication, this time by tagging an employer (Legal Professionals Education Network) and my professional regulator (Law Society of Ontario). The tweets include partial and misleading screenshots from our private messages or DMs. The materials sent on May 28, 2024, should help clarify the scope of Elisa Hategan's ongoing harassment and breach of conditions.**
- Additionally, I had to file two separate yet connected police reports in April and May about Josh Chernofsky (24-812268) and Gisela McKay (24-1203674), both of whom are actively spreading Elisa Hategan's conspiracy theories on top of the issues complained of in my reports. **The group of people targeting me both individually and collectively are escalating their attacks.**

One of my clients was recently jumped and robbed by masked strangers connected to the protest circuit, and I am terrified the same is about to happen to me. **Can I please book a time to visit the station ASAP? I would like to take you through the supplementary evidence specific to Elisa Hategan and connect it to the broader network of harassment. I need support from TPS to enforce the law and protect my safety, including by issuing cautions and/or laying charges** (including the possibility of defamatory libel, s. 298 Criminal Code). I am available at your earliest convenience. **My life is pretty much on hold due to the constant state of fear.”**

aaaaa) **EMAIL TO POLICE dated JUNE 18, 2024**

“Dear D.C. Vigna, I am following up because Elisa Hategan persists in obsessively posting about me on social media. Her latest post suggests that I tried getting police to kill her and/or provoking her into suicide. She includes a list of cherry picked messages from me to her. She presents as a jilted lover. This must be considered in the broader context of Elisa Hategan’s online activity. **For someone to be charged with criminal harassment to continue unabated with a vicious public attack campaign against the target makes a mockery out of the justice system. Her posts are designed to incite others and deprive me from having any peace of mind.**

Elisa Hategan has participated in extremist (neo-Nazi) behaviour from an early age, and she was trained in harassment techniques by a CSIS operative. She specializes in manipulating others to do her bidding— I know because she tried influencing me to go after [REDACTED] on countless occasions.

As her current object of fixation, I find myself living in a constant state of fear and anxiety. Police intervention is the only form of recourse available to make this stop.

Please let me know what additional information is required to consider laying additional charges, including breach of recognizance or defamatory libel.

bbbbb) **EMAIL TO POLICE dated June 19, 2024**

“Dear D.C. Vigna, Please see the latest from Elisa Hategan: **These posts constitute ongoing harassment against me.”**

cccc) “No one else would have ownership of this website, only the accused”

dddd) is connected, involved with, and/or operates X accounts @SP411STAR, @Focustnv, and any other anonymous accounts and internet domains.

83. Ms. Sa'd's defamatory comments prejudiced 14 Division Toronto police against Elisa Hategan, and influenced them to wrongfully arrest her on two separate occasions, and nearly a third time, causing her severe emotional and financial damages, including approx. \$30,000 in legal bills.
84. Sa'd repeatedly urged police to arrest Ms. Hategan for breaching conditions not to post anything on social media about her, which Hategan had not done. Sa'd also falsely communicated to police that Ms. Hategan was the owner of the internet domain carymasad.ca, telling Detective Constable Jacob McNabb that: **"No one else would have ownership of this website, only the accused"**.
85. Ms. Sa'd falsely communicated to police that Ms. Hategan had pointed the carymasad.ca domain to a LinkTree page that connected to X account @SP411STAR, to "slander" and "tarnish her reputation". Ms. Hategan never posted anything on social media about Sa'd after the condition was added (not to post anything on social media about Sa'd) following her second arrest on June 26, 2024. She does not know who is the current owner of carymasad.ca, nor does she know who operates @SP411STAR on X.
86. With absolutely no proof because it is an outrageous lie, Ms. Sa'd falsely communicated to 14 Division constable Jacob McNabb that Ms. Hategan was the operator of an anonymous X account identified as "Dreamer/@Focustnv. Sa'd lied to constable McNabb, pushing him to arrest Ms. Hategan by telling him that she had observed Hategan using the Dreamer account on her phone, though she did not advise him of a specific date/location – conceivably because the incident was fabricated in its entirety by Sa'd.
87. Ms. Sa'd's boyfriend, Adam Lee Wasserman, has made malicious and dehumanizing comments about Ms. Hategan in public and over the internet. His insults cast Ms. Hategan, a Jewish woman who lost relatives in the Holocaust, as a "Nazi" who operates a "neo-Nazi gang". In May 2024, Wasserman attended a pro-Palestinian encampment on the University of Toronto campus and asked protesters, ***"Is this the neo-Nazi gang of Elisa Hategan?"*** Wasserman accusing Elisa of operating a "neo-Nazi gang" was recorded on video by bystanders. Wasserman made the comment while working for Sa'd as a

“videographer”. He has publicly identified himself as an employee/affiliate of “The Law Office of Caryma Sa’d”, and Ms. Hategan asserts that both Sa’d and her law office are responsible for defamatory comments made by a person or proxy who represents himself as working on her behalf.

88. Contrary to Ms. Sa’d’s flagrant and vehement denials to police that her boyfriend hacked privileged correspondence and disclosed secret conversations via his defamatory Substack blog, Ms. Hategan can easily prove that Wasserman has full access to Sa’d’s emails and social media accounts – given that he sent her multiple derogatory emails from Sa’d’s law office email account. Recurrent text message apologies from Sa’d to Ms. Hategan for her boyfriend’s upsetting emails, and messages sent by Wasserman from Sa’d’s email and X inbox, offer irrefutable proof that Sa’d lied to police about her boyfriend not having access to her email and social media accounts.
89. It is a fact that Wasserman’s Substack blog discloses meetings and conversations Ms. Hategan had with Sa’d that she expected and believed were covered by solicitor-client confidentiality, given that Ms. Sa’d had assured her since spring 2022 that their communications were privileged.
90. Multiple sources can confirm Wasserman’s extensive involvement in Sa’d’s law practice. Among them are Yelp reviews and CANLII decisions that reference “Lee”, along with Sa’d’s messages to the Plaintiff. In her correspondence with Sa’d, Ms. Hategan refers to her chats with Wasserman about his dominant role in Sa’d’s practice and life decisions, including choosing her clothing and deciding what she can and cannot eat. Finally, in his Gatekeeper Substack blog, Wasserman appears to take credit for Ms. Sa’d passing the bar, and admits that he makes decisions on her behalf. He calls himself Sa’d’s “chosen gatekeeper”, and states that “*she trusts me to look out for her on her terms*”.
91. The words complained of are plainly false and are calculated to impugn the integrity of Ms. Hategan, to lower her professional and personal reputation in the estimation of right thinking persons generally, and to have her wrongfully arrested, charged, and incarcerated.

92. Moreover, the Defamatory Statements, in their natural and ordinary meaning, as well as any meaning by way of innuendo, are inherently malicious since the Defamatory Statements are abusive, exaggerated, misleading, extreme and disproportionate to the occasion on which they were published. The Defendant published the Defamatory Statements above in a deliberate attempt to tarnish the Plaintiff's reputation and have her wrongfully arrested and charged with crimes she did not commit.
93. Ms. Sa'd's publication of the false and defamatory statements complained of in this Statement of Claim have exposed Ms. Hategan to hatred, contempt, ridicule, wrongful arrests, a brief incarceration, and a baseless peace bond application that was thrown out of court. The statements are of the most serious nature, and include accusations of manifestly improper and criminal conduct. These false and defamatory statements caused devastating damage, loss and injury to Ms. Hategan.
94. On January 27, 2025, Ms. Sa'd published a defamatory X post about Elisa Hategan, accompanied by a photo collage of 9 people. The top row, middle photo, features a cropped photo of Ms. Hategan, taken when she accompanied Sa'd to Ottawa on June 9, 2023. Sa'd, who stands next to Elisa in the original photo, cropped herself out of the picture, then used Elisa's image to accompany an utterly false and libellous post that refers to Elisa as belonging to a "criminal element" that "incited" "harassment" and "specifically hatred and violence" against Sa'd, falsely tying it to a protester who spat at Wasserman. Ms. Hategan does not attend public protests, does not know the spitter, and had absolutely nothing to do with the incident Sa'd attempted to conflate with her name. She certainly has not conspired with them to "incite hatred and violence", as Sa'd falsely alleges:

"Got an unsolicited call from @TorontoPolice Hate Crimes Unit today, which marks the first time cops have reached out proactively to make an arrest based on my footage. But **this spitting incident did not happen in a vacuum, nor was it a random attack.**

There is a **coordinated, ongoing hate campaign** intended to limit my participation in the public sphere as a lawyer, journalist, and citizen. I have been targeted nonstop since 2021, and my family, clients, friends, colleagues, and supporters harassed as proxies; my videographer takes the brunt of abuse.

This spitting situation likely got special attention due to widespread outrage online— the public relations department is perhaps the tail wagging the dog at @TorontoPolice. In fact, I have documented and/or reported countless other crimes with no meaningful follow up. A meeting is being set up with @TorontoPolice **to discuss the underlying harassment, specifically hatred and violence incited against me by** Gisela McKay, **Elisa Hategan**, Josh Chernofsky, Jennifer Evans, Deana Sherif, Joe Morin, Clayton Goodwin, John Thibeau, and Brett Stewart.

This **criminal element** within the protest circuit is supported in part by politicians, union members, and certain media outlets.

My case is only the tip of the iceberg. #cdnpoli #ProtestMania

95. In her quest to silence and deprive Ms. Hategan of her Freedom of Expression, Ms. Sa'd has filed false reports about the Plaintiff with social media platforms such as X, which resulted in Ms. Hategan's posts to be "shadow-banned" and to vanish from search engines. On August 26, 2025, Sa'd filed a baseless report with X/formerly Twitter, falsely claiming that Ms. Hategan's December 10, 2023 post, which features a March 2023 photograph of Hategan and Sa'd taken at a Toronto bar/restaurant, on Hategan's phone, was a "private" image – even though there is nothing private or intimate about the photo. Ms. Hategan does not have a copy of the libelous correspondence between Sa'd and X Support, which resulted in her automatic suspension on a social media platform where she has had an account since 2009, and where she has never been previously suspended.
96. As a result of Sa'd's false reports, Ms. Hategan was locked out of her X account and remains suspended to the present day, unable to access her account. Ms. Hategan has never been suspended from any social media platform before. Sa'd lied to X Support by falsely claiming that the photo was a "private" image, even though Sa'd is a notorious public figure who regularly seeks media attention, strives to be famous and become an "influencer", and has her own Wikipedia Page. As a result of Sa'd's malicious and false reports, Ms. Hategan has lost her primary source of income – most of her public speaking and consulting requests, as well as crowdfunding donations, come from her X account.

97. The Defamatory Statements refer expressly, and in some instances implicitly, to Elisa Hategan. The Defamatory Statements contain serious allegations about Ms. Hategan in their plain and ordinary meaning or by virtue of the surrounding circumstances, which give the words a defamatory meaning and innuendo. The words complained of meant, were intended to mean, and were understood to mean that Ms. Hategan:

- (a) is a harasser / criminal harasser;
- (b) is a stalker who stalks Sa'd and her client(s)
- (c) poses a threat to Sa'd, and has threatened Sa'd
- (d) is "obsessed; "obsessive"; "fixated" on Sa'd
- (e) was involved / participated in hate crimes
- (f) was involved in an unsolved case involving a group home firebombed by Heritage Front
- (g) forms toxic, obsessive relationships and spreads unfounded allegations/conspiracy theories
- (h) ingratiated herself with Sa'd to get Sa'd to enact vengeance by proxy on a former friend; when Sa'd refused, she began to target Sa'd for harassment
- (i) specializes in manipulating others to do her bidding— and tried influencing Sa'd to go after [REDACTED] on countless occasions
- (j) reached out to Sa'd to seek help in violating an injunction (*rather than Sa'd reaching out first to seek information about CAHN, as her text messages to Hategan show*).
- (k) wanted to use Sa'd's platform to circumvent a civil court injunction
- (l) wanted Sa'd to produce a podcast about Elisa's life story that would clear her reputation (*Sa'd's text messages prove this was Sa'd's unsolicited idea*).
- (m) joked about poisoning her office cats, and poses a threat to her cats
- (n) lied about having 50% ownership / copyright of The Hategate Affair
- (o) lied about Sa'd owing her money

- (p) lied about being defrauded by Sa'd
- (q) lied about Sa'd promising to share professional contacts
- (r) belongs in jail
- (s) disclosed "confidential information" to a third party, breaching bail conditions – *Hategan gave evidence of Wasserman's stalking to one of his victims, and is a witness in a lawsuit*
- (t) conveyed a threatening message to Sa'd through a third party
- (u) is hell bent on ruining Sa'd's life
- (v) projects desire for vengeance
- (w) waged a vicious public attack campaign against Sa'd that makes a mockery out of the justice system
- (x) tweeted posts designed to incite others and deprive Sa'd from having any peace of mind
- (y) will not stop harassing Sa'd without police intervention
- (z) her ongoing actions constitute a sustained campaign of criminal harassment through false allegations, manipulation, threats, and the use of third parties
- (aa) Her behaviour reflects a pattern of toxic emotional dependence, stalking, intimidation, and misrepresentations/lies aimed at damaging Sa'd's personal and professional reputation, and inciting others to harass her
- (bb) has a long history of harassing private citizens
- (cc) targeted, threatened, and threatened to dox her client MaryAnn Watson
- (dd) is hunting Sa'd's client MaryAnn Watson
- (ee) was a threat to crash the funeral of Watson's mother-in-law
- (ff) dug up a twelve-year-old article about Sa'd that she circulated among Sa'd's "online harassers" to smear Sa'd as antisemitic
- (gg) sent the article to John Moore to "try and get [Sa'd] kicked off his radio show"

- (hh) showed up at a location where Sa'd was known to be working and sought out third parties for the purpose of disparaging Sa'd
- (ii) approached Rebel News reporter David Menzies to spread false and salacious rumours about [Sa'd] and told him she would "Get [Sa'd] back"
- (jj) wrote a 14-page letter that was "a jealous hit piece" against Sa'd's partner
- (kk) Lied about Sa'd's boyfriend Adam Lee Wasserman accessing privileged communications and disclosing secret conversations on a defamatory blog
- (ll) Gave Sa'd's family address to others; Collaborated with Sa'd's "online harassers" to disseminate Sa'd's mother's address and target one of her clients
- (mm) Conspires and collaborates with Sa'd's other "harassers" to "criminally harass" Sa'd
- (nn) Conspired with others to commit criminal activity
- (oo) Actively fabricated conspiracies that put Sa'd and her partner at risk of physical harm
- (pp) Harassed third parties due to their actual or perceived proximity to Sa'd
- (qq) Harassed Sa'd so severely that additional criminal charges were required, as well as additional conditions to restrict Ms. Hategan from frequenting locations that she has frequented, worked, and lived near, for two decades before ever meeting Sa'd
- (rr) Had her 1990s criminal charges withdrawn after making a deal with the Crown to testify against her former associates – rather than because she was innocent
- (ss) Did not convert to Judaism in good faith
- (tt) Breached her release order by contacting Sa'd directly on December 12, 2023. Circumvented being blocked by posting under another account within a thread
- (uu) Lied about Sa'd's partner intercepting their communications
- (vv) Lied about Sa'd's partner running an anonymous account
- (ww) Portrayed Sa'd's partner as an abusive pimp
- (xx) Exhibits Obsessive, Manipulative, and Threatening Behaviour
- (yy) Posts photos and videos imitating Sa'd's actions or locations

- (zz) Fits the profile of a stalker with severe personality disorders
- (aaa) Demonstrates an exaggerated feeling of self-worth and an obsessive desire for other people to admire and revere her
- (bbb) Exhibits a pattern of behaviour that includes hyper intimacy, cyber stalking, surveillance, harassment and intimidation, and coercion and threats
- (ccc) Is likely to escalate to physical aggression
- (ddd) Breached her conditions by “indirectly” contacting Sa’d’s “colleague” Dean Blundell;
Sa’d knew that Hategan and Blundell knew each other since before Hategan met Sa’d. Blundell was also Hategan’s colleague, and had offered her a Crier contract in Jan 2023.
- (eee) Reached out to Blundell, asking him to put her in touch with Sa’d in order to violate her civil gag order – *text messages from Sa’d show Sa’d herself first initiated contact with Hategan on July 30, 2021, followed her on X/Twitter, and sent her a DM asking for information about her legal adversaries*
- (fff) Disclosed her suicidal ideation and previous suicide attempts to “manipulate” Sa’d
- (ggg) Breached release conditions by tagging the Law Society of Ontario, Sa’d’s professional regulatory body, about being defrauded by Sa’d. Sa’d told police that Hategan contacting the LSO was “indirect communication” and she should be charged with failure to comply
- (hhh) owns and operates a neo-Nazi gang
- (iii) is part of a “protest circuit”
- (jjj) violated X Rules by posting a “private” photo of herself and Sa’d at a public outing
- (kkk) poses a threat that requires her to be reported to the Toronto Hate Crimes Unit
- (lll) incited hatred and violence against Caryma Sa’d.

98. The full extent of Ms. Sa’d’s defamatory statements about Ms. Hategan is not known to Hategan but is known to Sa’d.

99. Defamatory statements remain published on Ms. Sa'd's X page, which at the time of this filing has 63,500 followers. Her account is accessible to the public. The damages stemming from these false accusations are ongoing and cumulative. Due to the seriousness of the false and defamatory statements, the defamation is actionable per se and special damages need not be proven.
100. Further, or in the alternative, Ms. Hategan submits that by virtue of Caryma Sa'd's public profile and her audience of 63,500 followers, many of whom are journalists and members of the Jewish community, the defamatory posts have come to the attention of people with whom Ms. Hategan has interacted, including fellow journalists, media professionals, and members of her Jewish community.

Ms. Sa'd is Liable for her False and Defamatory Statements

101. Ms. Hategan asserts that being falsely accused of being a "criminal harasser" and of "inciting hatred and violence" against Sa'd, among all of Sa'd's other lies, has damaged her reputation and work as a journalist in a field where credibility and transparency are paramount.
102. Ms. Sa'd's malicious statements were noticed and further amplified by thousands of her supporters via likes, retweets, and derogatory responses. Her post about Ms. Hategan "inciting violence" has been Liked and Retweeted *thousands of times*.
103. Sa'd fans have accused Ms. Hategan of engaging in a "vendetta" and "vengeance tour" against Sa'd. Dehumanizing insults describe Ms. Hategan as a "Nazi" and a "criminal harasser" who is "crazy" and "obsessed" with Sa'd, rather than a wrongfully-accused victim cleared of false accusations, striving to seek accountability for the traumatic events she suffered as a result of Sa'd's unlawful conduct.
104. The defamatory statements published by Ms. Sa'd's hardcore fans are not just libelous in themselves; they are calculated, overt acts of intimidation intended to cyberbully, shame, silence, and intimidate Ms. Hategan from speaking out about what happened to her, and from pursuing justice against Sa'd.

These smears were published over a year's time and are plainly intended to cast Ms. Hategan as a liar, a "Nazi", and a "crazy" person in order to shield Sa'd and her boyfriend from scrutiny.

105. Ms. Hategan asserts that Sa'd and Wasserman have a history of forming unsubstantiated opinions about the identities of anonymous social media account operators who are critical of Sa'd, and work as a unit to destroy the reputations and careers of those they suspect of badmouthing them, with careless disregard for truth. Their accusations are so outside the boundaries of logic or reason, they cannot be interpreted as anything but malicious. Sa'd then shares her baseless assumptions with her close circle of zealous fans, prompting many to begin spreading Sa'd's unfounded guesses as statements of fact.
106. In a June 16, 2023 text message to Ms. Hategan, Sa'd misattributed a pejorative anonymous account to a man she thought of as her then-biggest enemy, writing, "*Keven is always my default assumption lol.*" That month, Sa'd sued the man for defamation and was countersued, eventually issuing a retraction / admission that she "caused harm". Ms. Hategan believes that to Sa'd and her entourage of hardcore fans, she has replaced Mr. Keven Ages as Sa'd's the new "default assumption".

Dropping Lawsuits in Exchange for False Testimony

107. In June 2025, evidence came to light indicating that Ms. Sa'd had approached at least one other individual she sued in Small Claims Court with an offer to "drop the case" against them in exchange for inaccurate or false testimony against Sa'd's other targets/enemies. On June 2, 2025, Wasserman's stalking victim Jennifer Evans published screenshots of a DM conversation between herself and one of several individuals Sa'd had sued for defamation. This person, who fears to come forward because the offer was presented during a confidential Settlement Conference, told Evans that Sa'd had offered to "drop the case" in exchange for untruthful testimony against Evans. The offer was declined.
108. Also in June 2025, Ms. Hategan discovered that a woman named Aileen Tobias ("**Tobias**") was posting defamatory lies about her on X. Tobias falsely accused Ms. Hategan of conspiring with Toronto

anarchists to spread “misinformation” about Caryma Sa’d via @SP411STAR, an anonymous X account. Created in April 2024, @SP411STAR has posted truthful information about Wasserman, identifying him as the owner and CEO of prostitution-industry website SP411.cc. Sa’d dishonestly categorized @SP411STAR’s posts as “harassment” and wrongly assumed Ms. Hategan was involved.

109. Prior to the accusation, Ms. Hategan had never interacted with Tobias. Alarmed at the false accusations, she tweeted to Tobias that her posts were libelous and she would be held legally liable. Almost immediately, Tobias deleted all her posts about Hategan. A cursory review of her social media posts revealed that Aileen Tobias, a Mississauga caterer / activist who operates the X account [@mvexposedtv](#) and [@millennialmom81.bsky.social](#) on BlueSky, is one of about a dozen individuals Caryma Sa’d sued in Small Claims Court. Tobias published her lies about Hategan one day after Sa’d dropped her lawsuit.
110. After reviewing copies of the Sa’d v. Tobias Statements of Claim and Defence, Ms. Hategan believes that Ms. Sa’d offered Tobias the option of dropping her lawsuit in exchange for Tobias identifying Sa’d’s enemies as operators of @SP411STAR, so Sa’d could have third-party corroboration and report her longstanding critics to police for “criminal harassment”. Hategan believes that Tobias was terrified at the prospect of being held liable for defamation and forced to pay \$35,000 for calling Sa’d a “Nazi”, and decided to corroborate Sa’d’s false narrative to get out of the lawsuit.
111. Tobias’ false accusations mirror Sa’d’s false accusations to police that Ms. Hategan is connected to the anonymous X account @SP411STAR. Sa’d’s false accusations are included in police reports Hategan was able to obtain in July 2025 through a Freedom of Information request to TPS. Ms. Hategan neither operates @SP411STAR nor @FOCUSTNV, nor knows who does.
112. Ms. Hategan asserts that Sa’d and Wasserman believe that by getting their detractors charged criminally or smeared as harassers by way of peace bonds and Small Claims defamation lawsuits, their critiques of Sa’d and her boyfriend will be viewed as “harassment” and discounted by the public as

malicious fabrication. Sa'd's numerous false police reports present irrefutable evidence that Sa'd is attempting to have people arrested and charged with criminal harassment as a reputation management tactic. Ms. Hategan states that legitimate criticism of Caryma Sa'd is NOT a crime. At most, it is a matter of civil litigation.

Ms. Sa'd Breached the Rules of her Profession

113. Ms. Sa'd owed a duty of care to the Plaintiff, because Ms. Hategan was both a prospective client and a collaborative work partner who Sa'd enlisted to work with her. Although Sa'd was not retained and did not formally represent Ms. Hategan in legal proceedings, Hategan believed that her communications with Sa'd were covered by solicitor-client privilege. During their friendship, Sa'd had provided ad hoc advice and moral support in at least three separate legal matters, as evidenced by:

- a) Sa'd's repeated commitment to Ms. Hategan, verbally and in writing, that their conversations were privileged and bound by confidentiality
- b) Sa'd's request for access to Ms. Hategan's legal files, obtained via a Google Drive folder
- c) Sa'd's access to Ms. Hategan's legal documents involving two separate civil action between 2018-2023, which were also discussed in person and in text messages/emails
- d) Sa'd accompanying Ms. Hategan to court on two separate occasions, in Oct 2022 and Jan 2023
- e) Sa'd telling Ms. Hategan that she was discussing her legal matter with other lawyers in a professional setting and capacity
- f) Sa'd reading legal documents pertaining to a second civil lawsuit started in 2023, and providing brief advice on the matter, leading to discussions about the possibility of Sa'd billing for time spent if Ms. Hategan's anti-SLAPP motion was successful

- g) Sa'd telling Ms. Hategan that she would assist her and others by compiling affidavits and statements to police to take legal action against an online cyberbully, which she failed to do.

Ms. Sa'd Breached her Duty of Care

114. In her capacity as a lawyer, Ms. Sa'd violated her Duty of Loyalty and Duty of Confidentiality. Sa'd owed a duty of care to the Plaintiff to ensure that all information would be kept confidential, and a duty to avoid conflicting interests – and she failed Ms. Hategan on both counts. These duty apply whether or not a prospective client ultimately retains the lawyer. Not only did Ms. Sa'd neglect her professional obligation not to divulge confidential information shared by Ms. Hategan, she failed to protect it from inadvertent or intentional disclosure. The duty of confidentiality also imposes an obligation for a lawyer to take reasonable steps to ensure the maintenance of confidentiality, and extends to the secure storage of confidential information. Ms. Sa'd took no steps to protect Ms. Hategan's information or ensure that it would not be accessed by third parties without consent.
115. Ms. Sa'd breached the rules of her profession when she:
- a) Ignored repeated requests from Ms. Hategan that their communications be kept private and not accessible or read by her boyfriend Adam Lee Wasserman. While Sa'd might use her boyfriend as an office admin, Ms. Hategan never consented to his intrusion into what she believed was highly-personal communication. In June 2023, after Ms. Hategan became aware that Wasserman was reading Sa'd's private messages on X and monitored/intercepted her law office email, she requested a confidential email address where she could communicate with Sa'd in private. Sa'd provided an email address that she assured Ms. Hategan was confidential, but Wasserman intercepted Hategan's letter before Sa'd had even read it. Offended at the letter and describing it as a "hit piece" (a phrase parroted by Sa'd in her police reports) because it outlined the Plaintiff's concerns with Wasserman's behaviour,

Wasserman seized control of Sa'd's communications and blocked Ms. Hategan from Sa'd's social media account, forcing Sa'd and Hategan to resort to alternate channels to communicate behind Wasserman's back for nearly two months.

- b) Allowed Wasserman to access personal details about Ms. Hategan's childhood physical/sexual abuse and explicit violence that happened to her and others, including details about the brutal rape of a family friend by a Romanian Securitate officer, and details about her Romanian childhood friend who was sold and sex-trafficked by human traffickers. Ms. Hategan never consented to Wasserman reading this information, in light of his extensive involvement and participation in the prostitution industry.
- c) Failed to protect Ms. Hategan from her boyfriend's abusive behaviour and unwanted communications
- d) Permitted her boyfriend to publish a libelous article on Substack that discloses confidential information gleaned from correspondence that was not addressed to him, or intended for him, and from in-person conversations held between Ms. Hategan and Sa'd. The article distorts events and aims to defame and dehumanize Ms. Hategan in an effort to discredit her.
- e) Leaked information, and/or allowed Wasserman to leak information, communicated by Ms. Hategan to Sa'd in her capacity as a lawyer, to a third party. Enabled this information to be published on the internet via an X account owned and operated by Ms. Sa'd's client MaryAnn Watson under the handle @SeriousMother. Across 2023-2024, @SeriousMother disclosed information the Plaintiff had communicated only to Sa'd, which is not found elsewhere on the internet. The @SeriousMother account also incited violence against Ms. Hategan.
- f) Breached Duty to avoid Conflict of Interest, by exploiting her friendship and prospective client relationship with Ms. Hategan in order to obtain otherwise-inaccessible information

about members of the Canadian Anti-Hate Network (CAHN). Sa'd used information gleaned from Ms. Hategan toward her own goals of taking revenge against CAHN after they published an article critical of her in July 2021, and to further the goals of another informal client, Diagon leader Jeremy Mackenzie.

g) Sa'd promised that she would vindicate Ms. Hategan, but used the Plaintiff's legal materials and intellectual property to benefit:

- i. Sa'd's personal interest and intention of suing the Canadian Anti-Hate Network (CAHN) after a critical article about her was published on CAHN's website in July 2021
- ii. Her duty and loyalty to another client, Jeremy Mackenzie. Ms. Hategan believes that Mackenzie paid Sa'd for work on The HateGate Affair, the September 12, 2023 85-page longform article co-authored and written in majority by Ms. Hategan. Elisa is entitled to receive half of all earnings as per her agreement with Sa'd, but received nothing.

NEGLIGENCE

116. A breach of duty of care is the failure to uphold a legal obligation to take reasonable steps to avoid causing foreseeable harm to others. In a negligence claim, a plaintiff must prove a duty was owed, that the defendant's conduct fell below the standard of care expected of a reasonable person in that situation, and that this breach caused harm.

The Plaintiff relies on the following material facts in support of her claim in negligence:

- a) Ms. Sa'd's breach of her duty of care extends to her failure to protect Ms. Hategan's communications from her boyfriend's intrusions, as well as his verbally abusive behaviour.
- b) Over the course of a year, Ms. Sa'd repeatedly sought out and solicited Ms. Hategan's assistance as a mentor, a ghostwriter, co-author and editor of articles, as someone from whom

Sa'd sought ideas and advice, and as company during out-of-town trips. During these trips, as well as on different occasions throughout 2023, Ms. Hategan was exposed to abusive behaviour by Sa'd's boyfriend. This abuse included screaming and shouting matches where Wasserman disparaged both Ms. Hategan and Sa'd, calling them lazy, useless, and similar invectives.

Noteworthy incidents occurred in North Bay, as well as during a drive back from a Peterborough protest in June 2023, where Wasserman started screaming at Ms. Hategan after she inquired about Ms. Sa'd's false promise to sublet her an empty office space.

- c) Ms. Sa'd failed to protect Ms. Hategan from her boyfriend's abusive and explosive tirades. Ms. Hategan was subjected to Wasserman's abusive comments in person and through emails sent to her from Caryma Sa'd's own law firm email address. In multiple email correspondences to Ms. Hategan sent using his girlfriend's law office email, Wasserman addressed the Plaintiff in a derogatory manner and demanded that she delete social media posts where she wrote about her depression and suicidal ideation, which Wasserman claimed "looked bad" for Sa'd's "brand".
- d) On September 25, 2023, Ms. Sa'd enlisted Ms. Hategan to travel to North Bay to work on an investigative article about Yaroslav Hunka, a former Ukrainian SS soldier who was given a standing ovation in Canadian Parliament. Ms. Hategan asked Sa'd about the angle of the story the night before they left town, and Sa'd text-messaged her that there were "no real parameters". It was not until their second day in North Bay that Sa'd disclosed to Ms. Hategan that the trip funder wanted a favourable article about Hunka, and their angle was to humanize Hunka. Ms. Hategan, a Jewish woman, experienced mental distress at the idea of writing a sympathetic article about an SS soldier, especially given the fact that many of her extended Jewish relatives had lived in the same geopolitical region where Hunka's squadron might have participated in the deportations and slaughter of people who could have been her relatives.

- e) As a direct result of their work on that trip, and abusive online comments targeting Ms. Hategan after Ms. Sa'd uploaded videos of the two of them in North Bay, Elisa suffered a mental health break on her third day in North Bay. Instead of ensuring that Ms. Hategan receive support or medical care, Sa'd allowed her boyfriend Adam Lee Wasserman to block Ms. Hategan on Sa'd's phone and social media accounts, after he insisted that the Plaintiff's suicidal ideation was a bad look for Sa'd's "brand" as a social media influencer.
- f) Ms. Sa'd did not tie up loose strings and compensate Ms. Hategan for her time and labour over the three-day trip, did not disburse her share of earnings, gifts and donations for articles she had worked on throughout 2022-2023, or even reimburse travel expenses associated with the trip, as promised in Sa'd's text messages to the Plaintiff.
- g) After Wasserman blocked Ms. Hategan on Sa'd's phone and social media accounts and issued an ultimatum to Sa'd demanding that she cut all ties with Elisa effective immediately or lose him as a boyfriend, Sa'd "ghosted" the Plaintiff without notice. Sa'd's absolute relinquishment of her duty to Ms. Hategan had adverse consequences for Ms. Hategan's health and well-being.
- h) Sa'd then allowed her boyfriend to breach solicitor-client privilege and disclose private conversations between Hategan and Sa'd via [Wasserman's defamatory Substack "Gatekeeper" article](#), which aggravated Ms. Hategan's clinical depression and suicidal ideation.
- i) Ms. Hategan subsequent emails to Sa'd, inquiring about defamatory falsehoods appearing in Wasserman's libelous article and about the donations and earnings owed to her, went unanswered. Instead of sending Hategan a single email to inform her that her messages were unwanted, Sa'd immediately rushed to report the emails to police as "criminal harassment" and lied that Ms. Hategan had already been "cautioned" by police not to contact Sa'd.

- j) Meanwhile, Ms. Hategan believed that her messages to Ms. Sa'd were being deleted by her boyfriend, and continued to email her, sending approx. fifteen emails in the span of nearly three months. In the absence of any messages from Sa'd acknowledging receipt of her emails, and in the absence of a single message from Sa'd communicating that her correspondence was unwanted, Ms. Hategan had no way of knowing that her emails had reached Sa'd without Wasserman's interference, particularly as he had hacked their correspondence before.
- k) Throughout her friendship, Sa'd's boyfriend had shown that he: has full access and control over Sa'd's emails and social media profiles; had repeatedly emailed Ms. Hategan from Sa'd's social media and law office email accounts; had admitted on his Substack blog to interfering in their communications, and had a history of seizing control of Ms. Sa'd's communications with Ms. Hategan and blocking her whenever he became angry, jealous, or concerned that they spoke negatively about him or text-messed too much;
- l) Sa'd breached her Duty of Confidentiality by reporting Ms. Hategan's confidential communications to police as "criminal harassment". Barring any notice, caution, or warning to Ms. Hategan that her correspondence constituted "harassment", Ms. Hategan's emails/messages to Sa'd should have been kept confidential by solicitor-client privilege.
- m) Sa'd knew, or ought to have known, that Ms. Hategan was never told that her messages to Sa'd were unwanted, and that she had never been cautioned by police, and yet persisted in filing multiple false police reports to have Ms. Hategan wrongfully arrested and charged with crimes she did not commit.
- n) As a result of Sa'd breaching her duty of care owed to the Plaintiff, the Plaintiff suffered severe emotional distress, economic losses, and significant financial damages.

FRAUD

117. The Plaintiff relies on the following facts in support of her claim for civil fraud:

- a) The Defendant has made false statements to the Plaintiff that are outright lies, and reckless statements made without regard to the truth. Many of these statements were communicated by text messages from Sa'd's phone or X Messages inbox. False representations made by Sa'd across the span of a year include but are not limited to:
 - i. Promises to help Ms. Hategan find a place to stay (Jan-June 2023, verbal + text message)
 - ii. Promises to sublet one of her vacant office spaces to Ms. Hategan at reduced cost (May 10 - June 21, 2023, verbal + text message)
 - iii. Promises to produce a podcast that would showcase Hategan's life story and correct factual errors in the lawsuit she lost (Oct 15, 2022 - Sept 2023, verbal + text message)
 - iv. Promises to help her deal with cyberbullying by taking legal measures on her behalf
 - v. Promises to start a non-profit organization with Ms. Hategan to help her generate an income through grant-writing, speaking, and fundraising campaigns (July-Sept 2023, verbal/text)
 - vi. Promises to split "journalism" earnings and donations with her. Sa'd even shared screenshots of donations she collected on their behalf, to keep Ms. Hategan motivated (Dec 2022 – Sept 2023, verbal + text messages)
 - vii. Promises to share professional contacts with renowned journalists / media influencers
- b) The Defendant knew that her representations were false and/or reckless as to the truth
- c) The Plaintiff relied on Sa'd's falsehoods and continued to work for free across the span of an entire year, believing that she would be eventually compensated through:
 - i) profits generated via a not-for-profit organization Sa'd had committed to start with Ms. Hategan
 - ii) earnings and donations Sa'd promised to split 50-50 with her
 - iii) profit-sharing after mentoring, growing, and developing Sa'd's "brand" as a social media

influencer and journalist

iv) expanded professional connections with high-profile journalists and media influencers

- d) None of the Defendant's promises ever came to fruition. As a result of Sa'd's lies, which occurred over a prolonged period (December 2022 – September 30, 2023), Ms. Hategan suffered financial losses, and was deprived of her rightful earnings.

TORTIOUS INTERFERENCE WITH ECONOMIC INTERESTS

118. The Plaintiff relies on the following material facts in support of her claim for tortious interference with economic interests:

- a) Sa'd has made false public statements regarding Ms. Hategan that have portrayed her in a false light and interfered with her ability to perform work as a journalist and/or public speaker
- b) Sa'd exploited Ms. Hategan with false promises of future compensation, then reported her to police for "criminal harassment" while keeping all of Ms. Hategan's rightful earnings for herself. Ms. Hategan asserts that Sa'd's behaviour is clearcut theft and fraud. Ms. Hategan was defrauded of her earnings (the total amount being unknown to her) and subsequently framed by Sa'd with wrongful arrests intended to silence and criminalize her, render her unable to take legal action against Sa'd, and discredit her as a witness in future legal proceedings against Sa'd.
- c) Despite promising Ms. Hategan that she would share all professional contacts that emerged as a result of their collaborative journalism, Ms. Sa'd intentionally refused to connect or introduce Ms. Hategan to journalists who praised and appreciated work she had created with Sa'd, such as former CTV anchor Lisa LaFlamme and a senior editor at Tablet Magazine, an important Jewish magazine with nearly a hundred thousand followers – a media outlet that, for a Jewish freelance journalist like Ms. Hategan, would have been an invaluable contact.

- d) Sa'd has denied that Ms. Hategan has joint ownership and copyright of The Hategate Affair and is entitled to 50% of all earnings, reporting Hategan's claims to police as "criminal harassment" despite the fact that Sa'd's text messages, emails, and social media posts prior to September 30, 2023 plainly acknowledge Hategan's stake and joint ownership of the project. In a Sept 18, 2023 post, Sa'd wrote: "Canadian icon @elisahategan is not afraid to pull back curtains. She has a beautiful way with thoughts & words. Without her, there would be no #Hategate exposé."
- e) Throughout July-September 2023, Sa'd committed to registering a non-profit organization with Ms. Hategan; extensive discussions and a planning meeting were held. The agreement was that Ms. Hategan would write grant applications for funding that would be split with Sa'd, and she would gain a 5% commission. Ms. Hategan continued to work on collaborative articles for Sa'd and as her personal advisor, under the impression that she would be compensated after the NFP was established. As a result of Sa'd's promises, Ms. Hategan wrote a Mission Statement and conducted extensive research into grant applications, expecting that she would earn an income. Instead, a for-profit organization was established during the same month Ms. Hategan met with Sa'd, and incorporated by an "Adam Watson" using Sa'd's mother's Mississauga home address.
- f) Ms. Sa'd had no intention of establishing a not-for-profit with the Plaintiff, yet used false promises of incorporation, and false promises that she would sublet an unoccupied office space to Ms. Hategan, as a way to keep the Plaintiff engaged and working for free throughout the summer-fall of 2023 under the expectation that she would eventually be compensated.
- g) The Defendant's actions have undermined, prejudiced, and both directly and indirectly caused the Plaintiff to lose economic opportunities to secure paid projects and earn compensation and as a journalist, public speaker, and consultant. Ms. Hategan lost a year working for Sa'd instead of seeking other opportunities. Being subjected to baseless criminal charges for fifteen months also had a direct and central impact on the destruction of Ms. Hategan's reputation and career.

- h) Sa'd baseless and malicious statement that Ms. Hategan "incited hatred and violence" against her further diminished Ms. Hategan's reputation in the eyes of members of her own community, particularly given the fact that Sa'd has attracted a large conservative Jewish following due to her negative coverage of pro-Palestinian protests. Prior to her arrest, the majority of Ms. Hategan's speaking engagements came from the conservative or centrist Jewish community.
- i) Sa'd's actions have directly and indirectly interfered with the ability of the Plaintiff to travel out of the country as a speaker and consultant (given the restrictions imposed by having criminal charges restrain her freedom of movement over fifteen months)
- j) As a result of Sa'd tortious conduct, the Plaintiff suffered damages and economic loss.

INTENTIONAL INFLICTION OF MENTAL SUFFERING

Harassment of Ms. Hategan by Sa'd's Friends, Fans and Associates

- 119. Ms. Sa'd has directly and indirectly caused intentional infliction of mental suffering to the Plaintiff – through her own actions, her boyfriend's actions, and by tolerating cyberbullying, libel, insults and harassment inflicted on Ms. Hategan by zealous fans keen to defend Sa'd against any allegations of impropriety. Many of the insults spread by Sa'd's fans mirror the lies Sa'd told police about Hategan.
- 120. At no point in time did Sa'd intervene, call for the insults waged in her name to stop, or cut ties with the people actively harassing Ms. Hategan. On the contrary, Sa'd indirectly encouraged and rewarded Ms. Hategan's harassment by her fanbase, going so far as to promote, endorse, praise, and retweet many of the individuals involved in harassing, terrorizing, and/or threatening her.
- 121. Within days of Wasserman and Sa'd blocking Ms. Hategan without explanation or remuneration after she laboured for Sa'd for ten months expecting to be compensated, members of Sa'd's entourage started

calling Ms. Hategan a “Nazi” and a “neo-Nazi”, referencing her brief involvement with the Heritage Front when she was a minor teenage girl more than thirty years ago, while omitting her central role in the collapse of the Heritage Front and her demonstrable work in the Countering Violent Extremism (CVE) field in adulthood.

122. Starting in October 2023, Sa’d’s boyfriend Adam Lee Wasserman, her client MaryAnn Watson, and several other fervent fans engaged in a smear campaign aimed at painting Elisa as a dangerous “Nazi” – in sharp contrast to the previous two years where she was lauded by Sa’d and her fanbase as a heroine. The dehumanizing *ad hominem* attacks hurled at Ms. Hategan by Sa’d’s rabid fanbase were nearly always accompanied by valiant defences of Sa’d’s character, reducing and dismissing Elisa’s evidence-backed accusations to the works of a “crazy” “Nazi” romantically “obsessed” with Sa’d, in order to cast doubt and deflect from the potency and robustness of her allegations.
123. Ms. Sa’d’s false and disparaging statements to police about Ms. Hategan’s mental state were echoed in insults hurled at the Plaintiff by Sa’d’s boyfriend, zealous fans and close associates, who called Hategan “crazy”, a “nutcase”, a “lunatic who should be locked up in an asylum”, and an “obsessed” “criminal harasser” who Sa’d needed to be protected from with a restraining order. Although Ms. Hategan suffers from clinical depression and anxiety, she has never been diagnosed with any condition that could skew her perception of reality. She asserts that in fact it is Ms. Sa’d who is obsessed with her, given that she has not stopped trying to have Ms. Hategan jailed for speaking out about having been defrauded.

Ms. Sa’d’s Relationship with MaryAnn Watson, who Incited Violence against Ms. Hategan

124. Ms. Hategan asserts that Ms. Sa’d and her boyfriend have a pattern of exploiting mentally and emotionally vulnerable individuals – persons such as convicted criminal harasser Donald Smith, a BC client of Sa’d’s who suffers from a cognitive disability and has threatened Sa’d’s critics with a

sledgehammer, recording his threats on video; and her client MaryAnn Watson, a Victoria, BC resident who police described as having “severe mental issues” after speaking with her in May 2025.

125. Sa’d repeatedly referred to Watson as a “client” when lying to police that Ms. Hategan had “threatened” Watson and her family. The “threats” in question consist of a short Cease and Desist notices from Ms. Hategan communicating that she would go to police and/or commence civil action against Watson if her harassment did not stop. Sa’d lied on Watson’s behalf, reporting Ms. Hategan to police for “threatening” MaryAnn Watson and her family – a full two months after Hategan had reported Watson to York Regional police (on March 15, 2024) for inciting violence against her.
126. On May 28, 2024, Sa’d emailed an approx. 50-page letter to 14 Division constable Diana Vigna, whose failure to verify Sa’d’s false allegations had resulted in Ms. Hategan being wrongfully charged with criminal harassment in December 2023 for “disobeying multiple cautions” that didn’t actually exist. Sa’d’s letter is packed with repulsive lies about Elisa Hategan. Sa’d boldly lies to Vigna, claiming that Ms. Hategan not only “threatened” Watson and her family, but was a threat to “crash the funeral of Watson’s Holocaust survivor mother-in-law”. Ms. Hategan is disturbed by Sa’d’s vile lies on behalf of a woman who threatened her with violence, and asserts that a lawyer ought to have known that Cease & Desist notifications of intent to sue do not meet the legal definition of criminal harassment.
127. Sa’d’s close connection to MaryAnn Watson is highlighted in Sa’d’s choice to BCC’s her October 2, 2023 email to the Plaintiff, to four other people – her 3 closest lawyer friends, and Watson. On the same day Sa’d BCC’d her, Watson immediately commenced her year-long harassment campaign against Ms. Hategan, which preceded Hategan’s arrest by two months. The campaign escalated to Watson threatening Ms. Hategan with violence on X, via posts that urged the public to carve swastikas into her face.
128. On October 10, 2023, one week after Ms. Sa’d BCC’d Watson on her correspondence with Ms. Hategan, Watson posted on X: “Thinking **all former Nazi’s should B marked** so they can’t attempt 2 hide or

continue 2 be perpetrator. They will never B victim or hero. @csis failed 2 **mark the Nazis** as evident in Hunka's HOC appearance & **Hategan's continued effort 2 hide her nasty deeds.**" Watson's post is accompanied by a link to a video clip from the film "Inglorious Bastards", showing a swastika being carved into a Nazi soldier's face with a large butcher knife.

129. Watson continued to terrorize Ms. Hategan, stealing a childhood photograph of Ms. Hategan with her father, who died when she was a child, from her website, and publishing it on Watson's @SeriousMother X account, accompanied by obscene innuendos about Elisa having "shame" and "daddy issues". Ms. Hategan had disclosed her childhood parental abuse with Sa'd in confidence, not expecting that the information would be accessed by Sa'd's boyfriend and shared with third parties who would use it to terrorize her and subject her to relentless intentional inflictions of mental suffering.
130. Between 2023-2024, Watson derided Ms. Hategan on X, calling her a Nazi, an "Uber Nazi", a criminal and a terrorist who perpetrated "hate crimes" and "nasty deeds", who "caused harm" to Torontonians and Canadian citizens", and "likes 2 hunt & harass Jews". She posted offensive remarks about Elisa culled from the white supremacist neo-Nazi website Stormfront, along with hate propaganda (a racist Heritage Front anti-black flyer classified as hate propaganda by the Attorney General in 1993).
131. Watson tagged @TorontoPolice, OPP, CSIS, RCMP and other law enforcement bodies, urging them to arrest Ms. Hategan for hate crimes and for "hunting Jews". She also tagged Jewish organizations Ms. Hategan has worked or dealt with professionally, telling them that Hategan was an "Uber Nazi" targeting Jews for hate crimes. Watson also repeatedly published the link to Wasserman's defamatory [Substack blog "The Gatekeeper"](#), while tagging Ms. Hategan's name and X handle to ensure the public knew the blog was about Hategan. Sa'd tacitly encouraged Watson's extreme harassment of Ms. Hategan with retweets, shoutouts, and endorsements of Watson's X account.

132. Not content with degrading and destroying Ms. Hategan's professional reputation and causing her mental distress while fervently praising Sa'd and her boyfriend, Watson also published posts that disclosed solicitor-client privileged information Hategan had shared with Sa'd about her former legal adversaries; specifically, intimate details about a third party's sexual encounter. This information was not available anywhere else on the internet. Watson clearly gained access to sensitive information that could only have come from Ms. Hategan's DMs with Sa'd. Watson also published cropped versions of intimate photos of a third party that Ms. Hategan had sent to Sa'd while seeking legal advice.
133. In March 2024, Ms. Hategan file police reports about Sa'd's boyfriend and MaryAnn Watson with York Regional Police. In August 2025, she sued Sa'd's associate Michelle "Mitch" Hancock in Small Claims Court for harassment and defamation. The vile invectives aimed at Ms. Hategan, particularly the relentless insult that she is a Nazi, when in fact she is a Jewish woman who has had Jewish and Roma relatives perish in the Holocaust, have caused her immeasurable emotional distress. She has also received obscene, sexually-degrading, and threatening messages via her website's Contact Me web-form.
134. Between October 2-4, 2024, during Jewish high holidays, one of Sa'd's X followers, an anonymous account with the handle @AbudabiSus63909, replied to Ms. Sa'd's posts with threats aimed at Ms. Hategan. Sa'd did not block the account or "hide" its comments, a feature available to all X users. Instead, she allowed the account to continue posting threats to Ms. Hategan underneath Sa'd's posts for several days in a row. The posts featured gruesome cadaver photos of a woman stabbed to death, a woman holding a gun under her chin, and a photo of medication bottles. All the photos conveyed the message that Ms. Hategan would die. The images were accompanied by posts directed at Hategan:
- a) "@Carymarules Caryma was right, you don't deserve to live in this world. You are worthless. You are a fake JEW. You only belong in hell." (Oct 2, 2024 post, photo of woman with gun under chin)
 - b) "@Carymarules Caryma already made you socially dead, why are you still alive?? Don't forget your medication, your mental illness is obvious." (Oct 2, 2024 post, photo of pill bottles)

- c) “@elisahategan Elisa Hategan’s life is worthless, Brampton barbarian shall r@pe and dism@ember her. Asap. 🚩 🚩” (Oct 4, 2024 post accompanied by photo of 2 dead bodies)
- d) “@Carymarules @elisahategan Elisa Hategan’s death scene 🚩 🚩.Cheers. Lee will k!ll her”. (Oct 4, 2024 post, accompanied by graphic photo of female cadaver with stab wounds).

Ms. Sa’d is linked to Diagonon Extremists who Harassed Ms. Hategan

- 135. After Sa’d and Wasserman blocked Ms. Hategan, members of the far-right extremist group Diagonon (who tend to perceive Sa’d as a hero for her involvement in Diagonon leader Jeremy Mackenzie’s defence) began posting disparaging comments about her on social media. One of Diagonon’s most prominent members is Derek Harrison (“Harrison”), whose X account handle is @Derekrants.
- 136. On February 12, 2024, Ms. Hategan discovered (through an Amazon Look Inside search) that her name appeared in Harrison’s new book “Meme Kampf”, accompanied by homophobic and insulting fabrications about her. They include:
 - a) Lies denying the authorship of Ms. Hategan’s memoir Race Traitor, which Harrison claimed had been co-authored with a fabricated character named “Bob Gallagher”, who does not exist
 - b) Lies claiming that Ms. Hategan had been “pregnant with a child of mixed race” – when in fact Ms. Hategan is a lesbian and has never had sexual relations with a man, much less been pregnant
 - c) Lies about the 1998 CBC film White Lies being based on Ms. Hategan’s 2014 memoir, which is both false and chronologically impossible
 - d) Lies about her relationship and fallout with a former friend and founding member of CAHN
- 137. Before this date, Ms. Hategan had had no negative interactions with Harrison. She recalls that he followed her on X shortly after The Hategate Affair was published in September 2023. Soon after Ms.

Hategan was blocked by Wasserman and Sa'd, they had a brief DM exchange – at the time, Harrison appeared friendly and courteous.

138. Ms. Hategan immediately contacted Harrison and issued a libel notice, asking who had fed him the false information. Harrison's response was to call her a "Cunt", specifically writing, "She came with fangs out at me like a cunt, so I treated her like one", and "I completely understand her decision to apply for maid". Amazon eventually removed Derek Harrison's book from its platform, citing violations of its terms of service and Content Guidelines. However, it continues to be sold through Diagonon's website store and Harrison's website. Diagonon members blamed Ms. Hategan for the book's removal from Amazon, with one member calling her a "suicidal party pooper".
139. In her correspondence with police, Sa'd admits that Harrison provided her with screenshots of his brief DMs with Ms. Hategan, illustrating the direct connection between Sa'd and Diagonon far-right extremists/white nationalists, and confirming that Sa'd has engaged in private communications with Harrison prior to his publication of vile falsehoods about Ms. Hategan.
140. Sa'd barefacedly lied to police, telling them that Ms. Hategan "was ranting and spreading falsehoods" about Sa'd and "projected a desire for vengeance", an absurdity if you look at Ms. Hategan's actual exchange with Harrison. Harrison is a white supremacist who has expressed anti-immigrant, anti-Jewish and anti-LGBT views, and called for mass deportations of non-white immigrants. Despite his extremist politics and harassment of Hategan, Sa'd retweeted Harrison's X posts multiple times.

Impersonation and Doxing of Ms. Hategan's ex-Partner

141. On February 15, 2024, the same week Harrison's defamatory book was published, an anonymous account appeared on X, which Ms. Hategan believes was created and operated by Wasserman, who has a history of creating abusive accounts for the purpose of insulting his and Sa'd's critics. The newly-created

account impersonated Ms. Hategan's ex-partner, doxed her personal contact details, and tweeted confidential information to Derek Harrison, as well as to Diagon leader Jeremy Mackenzie and other white supremacists – a frightening prospect for the woman involved, who is a visible minority. The information posted was not known to anyone other than Ms. Hategan's civil lawyers, and Sa'd and Wasserman. The language used by the impersonating account was very similar to language used by other anonymous accounts targeting Sa'd's critics, which are suspected of being operated by Wasserman.

142. The fact that the account impersonating Ms. Hategan's former partner published details that could only have been known by Sa'd and Wasserman, confirmed to Ms. Hategan that either Wasserman or Sa'd were behind the impersonation. Nobody else would have had that information. The impersonation and doxing were reported to police and X support, and resulted in the account's suspension.

Malicious Wellness Checks

143. Ms. Hategan told Ms. Sa'd on several occasions – verbally and in text messages – that if she was ever arrested, she would commit suicide. In an April 21, 2022 DM exchange, Ms. Hategan told Sa'd, who had been pressing her for details about a woman involved in her previous civil litigation, that she didn't want to breach a civil gag order, adding, **"I definitely don't want to be arrested because of her, because it would push me over the edge - and if I kill myself, they win."**
144. Ms. Hategan disclosed her struggles with self-harm to Ms. Sa'd only after Sa'd expressly swore that she would never call police on Hategan. Sa'd told Ms. Hategan that she was safe to express her thoughts without fear of judgement, encouraging her emotional dependence on Sa'd and text-messaging her "You can call me any hour of the day or night". It was only afterwards that Ms. Hategan felt she could trust Sa'd enough to disclose her feelings. On June 6, 2023, Ms. Hategan again shared her feelings about committing suicide, telling Sa'd, **"And if things get ugly and cops or wellness checks get involved, it'll not only irrevocably end our friendship for the next few weeks, but it won't stop the inevitable."**

145. Ms. Hategan asserts that after she started speaking out about being exploited and defrauded by Sa'd, Sa'd – who clearly cyberstalks Hategan – spitefully went out of her way to send police to Ms. Hategan's doorstep as frequently as possible. In October 2023, Sa'd retweeted an X post by her BC client MaryAnn Watson, who urged the public to "Keep calling 911" on Ms. Hategan. Over and over again.
146. Ms. Hategan asserts that Sa'd sought to call police on Ms. Hategan as often as possible, even when there was no cause and Hategan hadn't expressed threats to harm herself, in order to push her into committing suicide. Sa'd feigned concern for Ms. Hategan's suicidal ideation as a pretext to inflict as much psychological harm on the Plaintiff as possible, knowing that Ms. Hategan had an intense phobia of police, and a wellness check would trigger severe anxiety attacks and cause more harm than good.
147. On the evening of July 10, 2025, Ms. Hategan published an article about being defrauded and exploited by Sa'd, titled "[The Many Lies of Caryma Sa'd](#)". The article described the suicidal ideation she had experienced in mid-January 2025 as a result of Sa'd's baseless complaints to Toronto Police, which nearly resulted in a third arrest. The next day, on July 11, 2025, two York Region police officers showed up at Ms. Hategan's door following yet another baseless wellness check initiated by Sa'd. The cops told Hategan that Sa'd reported her for threatening to jump off Leaside Bridge.
148. There was absolutely no reason for Sa'd to initiate a wellness check on Ms. Hategan, who was not suicidal at the time, and had written about a situation that had happened seven months earlier. Ms. Hategan asserts that Sa'd maliciously called 911, wasting law enforcement resources in an effort to re-traumatize Ms. Hategan with police involvement by falsely reporting suicidal ideation she experienced in January 2025 as an immediate threat that warranted a wellness check, in revenge for the article Ms. Hategan published a day earlier.

Intimidation of a Witness: Ms. Hategan's Phone Number was Spoofed to Call Police

149. On December 15, 2023, Ms. Hategan published a post on X where she asked for public support and donations to fight the criminal charges levied against her. In her post, she identifies as a “witness to testify for those who were harmed”. Approximately two hours after she published her post, York Region police officers started banging on Ms. Hategan’s door.
150. Ms. Hategan, who was alone in the house and did not have legal representation at the time, suffered an intense panic attack. Unable to move, she crawled to hide under a table, shook uncontrollably, and nearly passed out from fear. After a half-hour, the police finally left. Ms. Hategan was later told that the visit was precipitated by police receiving a 911 hang-up call originating from her phone number.
151. Ms. Hategan denies calling police, stating that she was cooking at the time the phone call was made and had not touched her phone. Ms. Hategan had already disabled the automatic emergency call function on her iPhone as soon as she purchased it, ensuring there was no possibility that accidentally pressing a button might trigger a police call. Ms. Hategan believes that Wasserman, or associates of Sa’d and Wasserman, were behind the spoofed 911 call, particularly as the call came in shortly after she posted on X that she planned to be a witness for those who were harmed by Sa’d.
152. As a result of this incident, Ms. Hategan met with York Regional Police detectives to ensure that a note would be made about her address, advising police of the possibility of fake 911 calls. The incident, coupled with other “wellness checks” and wrongful arrests, left her profoundly shaken and suffering from nightmares and PTSD episodes that have lasted into present day.

Ms. Sa’d is Liable for Intentional Infliction of Mental Distress

153. Between fall/winter 2022 and September 30, 2023, Ms. Sa’d sought out Ms. Hategan’s assistance as a mentor, ghostwriter, co-author and editor, and company during out-of-town trips. During these trips, Ms. Hategan was exposed to abusive behaviour by Sa’d’s boyfriend, including screaming and shouting

directed at Ms. Hategan and Sa'd. Notable incidents occurred in North Bay, and during a drive back from a Peterborough protest in June 2023, where Wasserman screamed at Ms. Hategan about Sa'd's promise to sublet an empty office space to Hategan.

154. Ms. Sa'd failed to protect Ms. Hategan from her boyfriend's abusive and explosive tirades, and to abusive comments she received from him through emails sent to her from Sa'd's own law firm email address. In multiple emails to Ms. Hategan, sent using Sa'd's law office email, Wasserman addresses the Plaintiff in a derogatory manner and demands that she delete social media posts he disapproves of, threatening to end her work with Sa'd if she disobeys.
155. On September 25, 2023, Ms. Sa'd enlisted Ms. Hategan to travel to North Bay to research and create an investigative article about Yaroslav Hunka, a former Ukrainian SS soldier who received a standing ovation in Canadian Parliament. The night before leaving town, Elisa asked Sa'd about the angle of the story, and Sa'd text-messaged her that there were "no real parameters". It was not until their second day in North Bay that Sa'd disclosed that the trip funder wanted them to humanize Hunka. Elisa experienced emotional distress at the idea of writing a sympathetic article about an SS soldier, given that her Jewish relatives had lived in that geopolitical region and were slaughtered in WWII.
156. After Wasserman blocked Ms. Hategan and issued an ultimatum to Ms. Sa'd, demanding that she cut ties with Elisa immediately or lose him as a boyfriend, Sa'd "ghosted" the Plaintiff and failed to compensate her for a year's labour. Sa'd did not disburse Ms. Hategan's share of earnings, gifts and donations for articles she had worked on between 2022-2023, or reimburse travel expenses associated with the North Bay trip, as promised in Sa'd's September 25, 2023 text messages, even as she continued to solicit donations and crowdfunding for "journalism" that encompassed Elisa's creative work and ideas. Sa'd's exploitation, fraudulent conduct, and broken promises had adverse consequences for Ms. Hategan's mental health and well-being.

157. Sa'd then allowed her boyfriend to breach solicitor-client privilege and publish defamatory falsehoods about Ms. Hategan on [Wasserman's defamatory Substack "Gatekeeper" article](#), which aggravated Ms. Hategan's chronic depression and suicidal ideation. Sa'd forwarded to police emails she received from Ms. Hategan concerning Wasserman's defamatory statements and the moneys and contacts she was owed after her year of labouring for Sa'd, reporting them as "criminal harassment".
158. Sa'd knew, or ought to have known, that Ms. Hategan was never told that her messages to Sa'd were unwanted, and that she had never been cautioned by police, and yet persisted in filing multiple false police reports to have Ms. Hategan wrongfully arrested and charged with crimes she did not commit.
159. At minimum, as an individual with extensive experience in social media and online discourses, and someone who encouraged Ms. Hategan to confide in her about her mental health vulnerabilities, Sa'd knew that harm was certain to occur as a result of her callous and highhanded actions. She knew, or should have known, that her recurrent deceptive and defamatory messages to police, the Courts and her fans, would result in widespread harassment of Ms. Hategan, and in her wrongful arrests/prosecution.
160. Four days after all criminal charges against Ms. Hategan were withdrawn by the Crown, and three days after Hategan was announced as a witness in a legal proceeding against her, Sa'd persisted in filing a baseless peace bond application against the Plaintiff, perjuring herself since peace bond applications involve swearing an oath about the veracity of your information.
161. Sa'd's malicious actions have had a debilitating effect on Ms. Hategan, rendering her hopeless and convinced that even after being cleared of all false accusations and spending approximately \$30,000 in legal fees to defend herself, her life will never return to "normal". Ms. Hategan strongly believes that Sa'd will never leave her alone for as long as she is alive; that she will persist with revenge-fueled false accusations until Ms. Hategan either kills herself or is wrongfully arrested once again. It is for this

reason that Ms. Hategan feels she has no choice but to take legal action against Sa'd, and urges law enforcement to investigate Sa'd for mischief, obstruction, and intimidation of a witness.

162. Sa'd knew that Ms. Hategan suffered from depression and anxiety disorder, had attempted suicide on multiple occasions, had a phobia of police rooted in her from childhood, and had confessed to Sa'd that if she was ever arrested for any reason, she would kill herself. And yet Sa'd intentionally persisted in urging police to visit Ms. Hategan's residence on numerous occasions, and to wrongfully arrest Ms. Hategan multiple times, exacerbating her clinical depression, anxiety, and distress.

163. As time went by, Sa'd's lies to police grew increasingly preposterous. Sa'd's most egregious lies feature the absurdly false claim that Ms. Hategan was involved in hate crimes, firebombings, had a criminal "restraining order" against her, and "joked" about poisoning Sa'd's office cats. Sa'd's August 24, 2023 text messages show that Sa'd *herself* came up with the perverse idea that critics would poison her office cats. Sa'd used the same malicious lie about her enemies being a poisoning threat to her cats in baseless police reports and peace bond applications sworn against at least four separate individuals.

164. Ms. Hategan is an avid cat lover, former cat-sitter, and the owner of two cats. She played with Sa'd's cats every time she visited her office, and regularly exchanged cat photos with Sa'd. Horrified at Sa'd's idea, she text-messaged Sa'd back to remind her that her office was secured by CCTV equipment and a front desk security guard, and nobody would do such a thing. Nevertheless, it is a fact that Sa'd lied to police by telling them that Ms. Hategan had "jokingly" threatened to poison her cats.

165. Sa'd knew or ought to have known that telling falsehoods about the Plaintiff to police in order to have her silenced and wrongly arrested and criminally charged, would cause her emotional and financial harm. Sa'd displayed reckless disregard for the damage that was likely to occur to the Plaintiff.

166. Ms. Sa'd's statements and actions constitute flagrant and outrageous conduct that was calculated to produce harm. Ms. Sa'd intended to produce this harm over a prolonged period of time. In this

endeavour she was joined by her boyfriend, Adam Lee Wasserman, her self-described client, Victoria BC resident MaryAnn Watson, her zealous fan Michelle “Mitch” Hancock, and other individuals who contributed to Ms. Hategan’s debilitating mental distress through a prolonged harassment campaign that included both insults, false and defamatory statements, and actual threats of violence.

167. As a result of Sa’d’s flagrant and outrageous conduct, Ms. Hategan suffered severe, ongoing emotional anguish and mental suffering, and has visible and provable illness that can be corroborated by medical records and witness statements.

AGGRAVATED DAMAGES

MALICE

Ms. Sa’d’s Malice and Intent to Harm

168. Ms. Hategan states that this is a proper case for aggravated and punitive damages. The fact that Ms. Sa’d is a practicing lawyer and cognizant of what she was doing is an aggravated factor.
169. Sa’d displayed astonishing cruelty to someone who had done nothing wrong, and whom she had manipulated, exploited and defrauded for a year. Conversely, she exhibited no shame or guilt when stealing Ms. Hategan’s rightful earnings. Sa’d is a Canadian-born practising lawyer from an upper-middle class family, who has been financially supported by parents who paid for her law degree. Sa’d has a much higher income than Ms. Hategan, who is a first-generation immigrant without family, and is unemployed. To this day, Sa’d continues to profit from her former alliance with Hategan.
170. In April 2022, after Sa’d repeatedly pressed Ms. Hategan for information that would breach her Civil court gag order, Elisa disclosed her phobia of police – telling Sa’d in text messages that she was so terrified of police, she would kill herself rather than be arrested. Armed with this knowledge, between 2023-2025 Ms. Sa’d contacted police numerous times, brazenly lying to authorities in efforts to have

Ms. Hategan arrested over and over again. In addition to filing her numerous false police reports, Sa'd called in no less than four separate "wellness checks" on Elisa, even at times when she hadn't said or done anything to merit such action.

171. On September 2, 2025 – the exact day her former friend, disgraced ex-lawyer James Bowie, was sentenced to 4 years in prison for threatening, extorting and harassing an ex-client – Caryma Sa'd, who exploited, defrauded and intimidated Ms. Hategan, a prospective client, posted on X a photograph of herself smirking as she looked out over Leaside Bridge, captioned by the derisive message, "*Please keep bicycles and pedestrians off the highway.*" It was the very spot where Ms. Hategan had confided to Sa'd that she planned to commit suicide. Ms. Hategan strongly believes that Sa'd's relentless efforts to have her arrested and imprisoned are part of an ongoing plan concocted by Sa'd and Wasserman to push her into committing suicide, in order for Sa'd to evade LSO disciplinary action, lawsuits where Ms. Hategan would provide material evidence, and law enforcement criminal investigations into her and her boyfriend's illicit and unlawful activities.
172. Ms. Sa'd's false and defamatory statements went far beyond commentary, opinionated statements, or naïve, erroneous or mistaken comments presented with zero proof. They were intentional and calculated to produce Ms. Hategan's arrests and mental distress. They were intended to silence Ms. Hategan through lawfare and incarceration – and there is ample evidence to show that Hategan is not the only person victimized in such a manner by Sa'd. Sa'd has admitted to filing numerous baseless harassment reports targeting her critics throughout Canada, likening the time she spent reporting critics to police for "causing harm" to her reputation as "*equivalent [to] a part-time job*". She has sworn multiple false peace bond applications that were ultimately thrown out of court, though not before causing emotional and financial devastation to the individuals victimized by her false claims.
173. Ms. Hategan is a victim of exploitation, deception, and fraud perpetrated by Ms. Sa'd, who purposely deceived Ms. Hategan into working for her for a year on the promise that she would be compensated.

Sa'd subsequently made every effort to cover up the fact that she robbed Ms. Hategan of her rightful earnings, by filing numerous false police reports that led to Ms. Hategan's unlawful arrest, criminal charges, and brief incarceration, and devastating emotional and financial damages.

174. Ms. Sa'd did this with the intentional aim of causing Ms. Hategan significant mental distress and mental suffering, and with full knowledge of Ms. Hategan's diagnosis of chronic depression, anxiety disorder, and previous suicide attempts. Ms. Hategan has no doubt that Ms. Sa'd intended to cause her so much mental distress that she would take her own life.
175. In September 2025, Ms. Hategan's complaints to the Law Enforcement Complaints Agency (LECA) were escalated to an active investigation by Toronto Police Services. However, Sa'd caused permanent damage to Ms. Hategan, both in terms of the emotional trauma and enormous financial costs of hiring criminal defence lawyers to defend herself – she was forced to borrow approximately \$30,000 to pay for her defence, money she cannot repay. Ms. Hategan does not have the financial means to pay for counselling to deal with the trauma she experienced as a result of her ordeal. Along with the two wrongful arrests, Sa'd's numerous false incident reports have caused Ms. Hategan's name to be entered into the Canadian Police Information Centre (CPIC) database so frequently that Hategan worries her name is forever tarnished for background checks and screenings, and might affect her future prospects.
176. Ms. Sa'd's representations to police, law enforcement, Crown attorneys and Justice(s) of the Peace were untrue, inaccurate, false and/or misleading, and were made intentionally and negligently. According to documents obtained from Toronto Police Services through Freedom of Information (FOI) request, as of the date of filing this Statement of Claim, Ms. Hategan remains under police investigation. She does not know what other lies Sa'd communicated about her to police, and she lives under a perpetual state of anxiety and distress. Her life has been irrevocably altered and devastated by Sa'd's malevolent and utterly false allegations.