

ONTARIO
Superior Court of Justice

Plaintiff's Claim
Form 7A Ont. Reg. No.: 258/98

[SEAL]

TORONTO

Small Claims Court

**47 Sheppard Avenue East, 3rd Floor,
Toronto, Ontario, M2N 5N1**

Address

(416) 326-3554

Phone number

SC-25-00014007-0000

Claim No.

Plaintiff No. 1

☐ Additional plaintiff(s) listed on attached Form 1A.

☐ Under 18 years of age.

Last name, or name of company Romero Hategan		
First name Elisa	Second name	Also known as Elisa Hategan
Address (street number, apt., unit) [REDACTED]		
City/Town [REDACTED]	Province ON	Phone no. [REDACTED]
Postal code [REDACTED]	Email address elisa@elisahategan.com	
Representative		Law Society of Ontario no.
Address (street number, apt., unit)		
City/Town	Province	Phone no.
Postal code	Email address	

Defendant No. 1

☒ Additional defendant(s) listed on attached Form 1A.

☐ Under 18 years of age.

Last name, or name of company Toronto Police Service Board		
First name	Second name	Also known as
Address (street number, apt., unit) 40 College St. Toronto ON		
City/Town Toronto	Province ON	Phone no. 416-808-8080
Postal code M5G 2J3	Email address Legal.Services@torontopolice.on.ca	
Representative		Law Society of Ontario no.
Address (street number, apt., unit)		
City/Town	Province	Phone no.
Postal code	Email address	

Les formules des tribunaux sont affichées en anglais et en français sur le site
www.ontariocourtforms.on.ca. Visitez ce site pour des renseignements sur des formats accessibles.

REASONS FOR CLAIM AND DETAILS

Explain what happened, including where and when. Then explain how much money you are claiming or what goods you want returned.

If you are relying on any documents, you **MUST** attach copies to the claim. If evidence is lost or unavailable, you **MUST** explain why it is not attached.

What happened? [See Schedule A and Schedule B.](#)

Where?

When?

How much? \$ **50,000.00**
(Principal amount claimed)


☐ **ADDITIONAL PAGES ARE ATTACHED BECAUSE MORE ROOM WAS NEEDED.**

The plaintiff also claims prejudgment interest from December 9, 2025 under:
(Date)

(Check only one box) ☒ **the Courts of Justice Act**
☐ **an agreement at the rate of** _____ **% per year**

and postjudgment interest, and court costs.

Prepared on: December 8, 20 25


(Signature of plaintiff or representative)

Issued on: _____, 20 _____

(Signature of clerk)

CAUTION TO DEFENDANT:	IF YOU DO NOT FILE A DEFENCE (Form 9A) and proof of service (either an Affidavit of Service (Form 8A) or a Lawyer or Paralegal's Certificate of Service (Form 8B)) with the court within twenty (20) calendar days after you have been served with this Plaintiff's Claim, judgment may be obtained without notice and enforced against you. Forms and self-help materials are available at the Small Claims Court and on the following website: www.ontariocourtforms.on.ca .
CAUTION TO PARTIES:	Unless the court orders or the rules provide otherwise, THIS ACTION WILL BE AUTOMATICALLY DISMISSED if it has not been disposed of by order or otherwise two (2) years after it was commenced and a trial date or assessment under subrule 11.03(2) has not been requested.

Schedule A attached to Form 7A

1. The Plaintiff, Elisa Romero Hategan, claims against the Defendants, Toronto Police Services Board and 14 Division police officers Diana Vigna, Franco Umbrello, Jacob McNabb:
 - (a) General and aggravated damages in the amount of \$50,000 for negligence, negligent investigation, false arrest, and unlawful detention;
 - (b) in addition, and/or in the alternative, general damages pursuant to s.24(1) of the Canadian Charter of Rights and Freedoms in the amount of \$25,000 for breaches of sections 7, 9, 10(a), and 15 of the Charter;
 - (c) Pre- and post-judgment interest pursuant to the Courts of Justice Act, RSO 1990, c C.43, as amended;
 - (d) Costs of this action in the maximum amount permitted under Rule 19 of the Rules of the Small Claims Court, O Reg 258/98; and
 - (e) Such further and other relief as this Honourable Court deems just.

The Parties

2. The Plaintiff, Elisa Romero Hategan (“**Elisa**”) 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. In 2019 she was nominated for a RTDNA award for a Global News article. As an expert on 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 has provided consulting services and workshops to law enforcement organizations such as Ontario Provincial Police and the Probation Officers Association of Ontario, and participated in joint presentations alongside OPP and RCMP officers.

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 4 months. She filed approx. 30 affidavits with Ontario Provincial Police and testified against 3 group leaders in court in 1994. Her testimony was cited by trial judge Tremblay-Lamer as being central to their convictions: *"I found Ms. Hategan very credible, candid, calm and patient during an intensive cross-examination. She has never contradicted herself, and her forthright demeanour and manner of expression left no doubt in my mind that she was credible. Such was the strength of her oral and affidavit evidence, that neither Mr. Droege's testimony or that of any other witness could refute or even seriously challenge it. Based on the evidence of Ms. Hategan alone, I am satisfied beyond a reasonable doubt that the defendants are guilty."*
4. Called a "hero" in the press but unable to enter the Witness Protection Program despite credible death threats, Elisa lived in hiding across Canada between ages 18-25, without police protection or familial support. A ninth-grade high school dropout from an abusive, broken home, Elisa was accepted to the University of Ottawa as a mature student, got through school on merit scholarships and working two jobs, and graduated *Magna cum Laude* in 1999 with a double major in criminology and psychology. She moved back to Toronto in late 2001, but never stopped worrying about her safety. She also retained a deep-seated fear of Toronto police – one of Elisa's 1993 affidavits resulted in a 14 Division constable being charged with discreditable conduct under the Police Services Act for being a Heritage Front member, purchasing their merchandise, and attending at least one KKK rally in Arkansas. This incident was reported in national news, and resulted in widespread criticism of TPS.
5. The Defendant, the Toronto Police Services Board ("TPSB"), is a civilian body that oversees the Toronto Police Service ("TPS"), and is at all material times responsible for the TPS. Its headquarters are located at 40 College Street, Toronto, Ontario M5G 2J3.

6. The Defendant, Diana Vigna (“**Vigna**”) is a resident of the Province of Ontario and was at all material times employed as a police officer (badge 82008) with the Toronto Police Service. She works out of 14 Division, a TPS station located at 350 Dovercourt Road in the City of Toronto.
7. The Defendant, Franco Umbrello (“**Umbrello**”) is a resident of the Province of Ontario and was at all material times employed as a police officer (badge 7755) with the Toronto Police Service. He works out of 14 Division, which is stationed at 350 Dovercourt Road in the City of Toronto.
8. The Defendant, Jacob McNabb (“**McNabb**”) is a resident of the Province of Ontario and was at all material times employed as a police officer (badge 11989) with the Toronto Police Service. He works out of 14 Division, which is stationed at 350 Dovercourt Road in the City of Toronto.

Overview and Chronology of Police Involvement

9. On November 29, 2023, 14 Division Toronto Police detective constable Diana Vigna (“**Vigna**”) left a voicemail for Elisa, instructing her to return her call. The following day, Elisa returned Vigna’s call and was informed that criminal harassment charges were being laid against her because she had purportedly disobeyed “multiple cautions and warnings” not to contact the complainant, Toronto lawyer Caryma Sa’d (“**Sa’d**”).
10. Elisa had **never received a single caution from police, or any warning instructing her not to email Sa’d**. Given her fear of police, and 14 Division in particular, Elisa would have immediately complied. When she 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 Elisa with evidence that she broke the law, specifically information about the “cautions” she purportedly “ignored”, which indicated to Elisa that Vigna was negligent in her investigation since the “numerous cautions” she

referenced did not actually exist. Undeterred, Vigna argued with Elisa, insisting she had disobeyed “multiple warnings and cautions”, and this was the reason for her arrest.

11. Between September 30 and mid-November 2023, Elisa sent approx. 15 emails to her former best friend and work partner, Caryma Sa’d, after being blocked without any warning on Sa’d’s phone and social media platforms by Sa’d’s jealous boyfriend, Adam Lee Wasserman (“**Wasserman**”), while in the middle of a work project Sa’d had commissioned. Elisa’s emails primarily relate to: 1) a [defamatory Substack article](#) published by Wasserman, which disclosed (without her consent) encounters and [solicitor-client privileged](#) communications between herself and Sa’d; 2) questions about money and credit related to articles co-authored by Elisa, which were still earning publicity and money that Sa’d collected and kept for herself, and 3) questions about Sa’d’s safety (i.e. *are you okay, what’s happening, what did I do, are you getting my messages, are you seeing this*, etc.). Other than one short email on October 2, where Sa’d told Elisa that she no longer wished to work with her (but didn’t address the issue of paying her for a year’s labour and future royalties, and never told her that her emails were unwelcome), Elisa never received a response, nor the moneys owed to her.
12. On December 10, 2023, Elisa surrendered herself to 14 Division police and was formally charged with one count of “criminal harassment by repeated communication” (CC 264(2)). In the video recording of her arrest, Elisa can be seen asking DC Vigna if she ever laid eyes on the “numerous cautions and warnings” she was alleged to have disobeyed: “*May I ask, were you actually given any...actual evidence that I had been told anything?*” Vigna answers Elisa’s question with an abrupt, “*We have reasonable grounds to believe that. That’s why we’re charging you.*” Vigna then tells Elisa that she will receive the requested information in the disclosure from the Crown. Needless to say, no such evidence was produced through Disclosure, because Vigna’s assertions that Elisa had disobeyed “multiple police cautions” that warranted her arrest were patently wrong.

13. The incorrect idea that Elisa had been “cautioned by police” originates with the complainant, Caryma Sa’d, whose false statements were automatically accepted as fact by 14 Division police, likely because Sa’d is a lawyer, resulting in negligent investigations that led to Elisa’s two wrongful arrests and a near-third arrest. Sa’d’s lie about Elisa’s purported “caution” appears to have been introduced into police reports on or around October 14, 2023, after two 14 Division police officers visited Sa’d at her Spadina Ave. Chinatown Mall law office to conduct a video interview that was captured on AXON bodycam. On video, Sa’d claims that Elisa was willfully disobeying a police caution not to contact her. The officers interviewing her repeat this claim, write it in memo books, and subsequently regurgitate it into multiple occurrence reports that precede Elisa’s first arrest – in effect, crystallizing a “broken telephone” of errors and falsehoods in 14 Division files. At no point does *anyone* from 14 Division take the time to fact-check and verify Sa’d’s fabrication.
14. The lie about Elisa’s disobedience of this imaginary “caution” (along with other fabrications by Sa’d) appeared in multiple 14 Division occurrence reports over the next two years. Specifically, in TPS reports 2023-2608706, 2023-2312449, 2023-2842128, 2023-2858414 and 2024-2249135, and likely other reports and communications Elisa was unable to obtain through disclosure or her Freedom of Information request. She asserts that 14 Division police, including but not limited to the Defendants named in this action, did not fact-check Sa’d’s lies and took Sa’d’s claims at face value, presumably because of the credibility afforded by her profession as a (cannabis and landlord-and-tenant) lawyer.
15. Disclosure packages, which Elisa obtained in spring 2024 and spring 2025, show that Sa’d lied to police numerous times, both on AXON Video and in writing, particularly in emails addressed to Vigna. The majority of Sa’d’s lies to police are comprehensively refuted by text messages and emails Sa’d sent to Elisa between 2021-2023, which offer undeniable evidence to the contrary, along with historical press and court records Sa’d knew about, but omitted or distorted to suit her false narrative.

16. After being charged with one count of criminal harassment on December 10, 2023, Elisa was released on her own recognizance, on the condition not to contact Sa'd (whom she had not contacted since November 2023) directly or indirectly. Elisa complied and never breached these conditions before her charges were withdrawn in March 2025. As a result of her conditions, Elisa was unable to make further requests for Sa'd to pay the thousands of dollars she was defrauded of, and was effectively prevented from suing Sa'd for fraud, because initiating a civil action against Sa'd could be construed as "indirect contact" – all the while the Limitations clock ran down.
17. In June 2024, Elisa was again arrested by 14 Division police and charged with "Failure to comply", because Sa'd once again lied and convinced them that Elisa's public tweets – which were not addressed to Sa'd, as both women had blocked each other on social media – were in breach of Elisa's release condition not to contact Sa'd. Sa'd told police that Elisa's social media posts ABOUT Sa'd were directed TO Sa'd. This is false. 14 Division cops Vigna and Umbrello did not fact-check Sa'd's lies before charging Elisa on Sa'd's word, again exhibiting prejudice in Sa'd's favour.
18. To secure Elisa's second arrest, Sa'd pestered and pressured police for several months, writing lengthy letters addressed to DC Vigna. One letter sent to Vigna on May 28, 2024 is emblazoned with Sa'd's law office letter-mail header, presumably to impress the gravity that it is Official Law Office Business. It is a combined 54 pages in length – a 7-page introductory letter prefacing a 47-page accompanying chart – and consists of at least 150 particularized lies. Among the highlights are the outrageous and utterly false accusations that:
 - a) Elisa committed hate crimes
 - b) was responsible for firebombings and terrorist activity
 - c) engaged in criminal activity – echoing Sa'd's Oct 2023 video statement where she tells police the blatant lie that Elisa had "done, or been involved with, dangerous stuff, her whole life."

- d) “threatened” Sa’d’s client – Sa’d told Vigna that Elisa had “threatened” a Victoria, BC client named MaryAnn Watson (“**Watson**”) and her family, after Elisa sent a Cease & Desist letter to Watson one day before she reported her to York Region Police (YRP) in March 2024. Watson had cyberbullied and incited violence against Elisa for months before Elisa went to YRP. Two and a half months after Elisa filed her report, Sa’d tells Vigna that Elisa had “threatened” Watson and her family in her C&D. With this lie, Sa’d effectively became Watson’s accomplice.
- e) posed a danger to Sa’d because of the Israel-Hamas conflict – because Elisa is Jewish and Sa’d, who was born in Canada of an Indian mother, has Palestinian roots on her father’s side
- f) “joked” about poisoning her office cats (an idea that Sa’d herself had invented, text-messaged to Elisa, and used in false police reports filed against at least four innocent people)
- g) lied about being defrauded and owed money by Sa’d, and co-owning the copyright to her work
- h) lied about Sa’d taking Elisa’s Schedule III prescription medication and encouraging her to switch from Ritalin to Adderall because Sa’d preferred the latter
- i) lied when she disclosed that Sa’d’s boyfriend had stalked women; trespassed on the property of a female critic; owns a prostitution review board and sex industry-adjacent business; hacked Sa’d’s emails to access Elisa’s correspondence without her consent; sent derogatory emails to Elisa from Sa’d’s law office email; and was directly involved in the events leading to her wrongful arrests. These statements are all true and verifiable; proof is attached to Schedule B.

19. On the evening of June 25, 2024, detective Franco Umbrello called Elisa to inform her that she was to surrender herself to 14 Division police the following day, to be charged with two counts of failure to comply (reduced to one count the next day) for allegedly breaching her release undertaking. Elisa was in shock – at no point in time had she attempted to contact Sa’d, or asked anyone to forward any messages to Sa’d. In tears, Elisa asked Umbrello what she had done. Umbrello seemed confused, but assured her – as Vigna had done in December 2023 – that their grounds for arrest would be disclosed

by the Crown. Unable to understand why Umbrello decided to charge her if he couldn't explain to her what she had done wrong, Elisa pleaded for a reason. Umbrello finally told her it was because she gave information about Sa'd to "a third party" and contacted Sa'd through that third party, and that Elisa herself had contacted Sa'd directly on X/formerly Twitter. Elisa asserts this was an impossibility, since both she and Sa'd were mutually blocked.

20. Elisa would later learn that Sa'd told 14 Division police that Elisa breached her release conditions because she had "slandered" Sa'd and "gave confidential information to a third party who posted it on Twitter" – after Elisa gave material evidence to a woman who was stalked by Sa'd's boyfriend, Adam Lee Wasserman ("**Wasserman**"), and after she agreed to appear as a witness against Sa'd in a lawsuit. Elisa asserts that giving evidence and being a witness for a third party stalked by Sa'd's boyfriend was not a violation of her release undertaking. Elisa had sent the materials to Wasserman's victim **before** she was charged with criminal harassment and **before** any conditions were imposed – another fact that 14 Division police never bothered to confirm before accepting Sa'd's narrative.
21. The "confidential information" Sa'd claimed was in violation of Elisa's release conditions was not confidential nor slanderous, but consisted of videos and photos from Sa'd's text messages to Elisa, which showed **Sa'd's boyfriend stalking a Toronto woman** named Jennifer Evans ("**Evans**"), who Sa'd had sued for defamation in spring 2023 after she accused Sa'd and Wasserman of, among other things, criminal harassment and stalking. The evidence Elisa shared with Evans effectively destroys Sa'd's defamation case, because it shows that Evans was correct to suspect she had been stalked.
22. While soliciting Elisa's **consigliere** advice, Sa'd had unsolicitedly text-messaged videos and photos of Evans taken by Wasserman outside Evans' condo and at assorted Toronto locations, videos and photos taken when Sa'd and Wasserman **trespassed onto a different woman's property at 4 AM** in

December 2022, and DMs that disclosed her intention to post a [poison-pen article](#) to defame Evans; it was published pseudonymously on Crier Media the day after Sa'd texted Elisa about her intention.

23. After Elisa was charged in December 2023, Jen Evans posted screenshots of incriminating evidence Elisa had given her, then tagged Sa'd on X/formerly Twitter to confront her. Sa'd immediately called police, who told her that it was "a civil matter". Undeterred, Sa'd wouldn't take no for an answer. After six months of bombarding Vigna and Umbrello with emails and letters written on her law office letterhead, Sa'd finally convinced them to charge Elisa again – for a breach that never happened. Sa'd claimed that Elisa had contacted her "indirectly" through Evans, because Evans posted Elisa's evidence (her "receipts") on Twitter and called out Sa'd for stalking and defaming her.
24. In no way did Elisa instruct Jennifer Evans to publish anything, much less to tag or engage with Sa'd. Evans did so of her own volition. Elisa speculates that Evans published the evidence to prove to her followers that she had been stalked, rather than wait until trial to make it public. Still, Evans' decision to publish the materials Elisa sent to her was not criminal or unlawful. Toronto police never produced any evidence or production orders to show that Elisa had instructed Evans to communicate with Sa'd – because it never happened. Elisa asserts that Sa'd's efforts to have her arrested for "sharing confidential information" (that was shared with Evans before Elisa's arrest) is part of an intimidation campaign to stop her from testifying as a witness in civil proceedings where Sa'd is a party.
25. Sa'd further lied to police, telling them Elisa had breached her conditions because she tagged the Law Society of Ontario ("LSO") in X / Twitter posts where she spoke about being defrauded by Sa'd. Elisa asserts that tagging the LSO, a professional regulator, to tell them she had been defrauded and exploited by Sa'd, is NOT indirect communication because she: **a) did not tag Sa'd in the tweets, so no *direct* communication occurred, and b) did not ask the LSO to pass on any message to Sa'd,**

so no *indirect* communication occurred. Elisa simply reported what had happened to her, in hopes that the LSO could assist her, since she did not have a lawyer at the time.

26. Elisa asserts that she was advised by lawyers to contact the LSO, and was told that reporting a crime is not “indirect contact” with the criminal. In the same way that a person who is assaulted by a police officer and calls 911 to report the crime, is not directly *or* indirectly contacting the cop who committed the assault, but is communicating with the professional regulator mandated to investigate assaults. And yet, once again 14 Division cops decided to charge Elisa without questioning her first.
27. On the morning of June 26, 2024, Elisa surrendered to 14 Division, where she was taken into custody and formally charged with one count of “Failure to comply”. She was deprived of her liberty, subjected to a humiliating “parade” and pat-down in front of both male and female cops, incarcerated in a cell where excrement was smeared on the walls, suffered bruises (*see schedule B*) on her wrists from tight handcuffs, and was subsequently forced to borrow tens of thousands of dollars to retain a defence lawyer. When she asked for an investigator to come to the cell block and tell her what she had done wrong, a plainclothes detective (who did not identify himself by name, but Elisa thinks he may have been Umbrello) came to stand outside the door of the cell where Elisa was imprisoned and shouted at her through the plexiglass window: “*Stop posting about Caryma on Twitter!*” When Elisa asked to see the evidence of her supposed “breach”, the man screamed “*NO!*” and stormed off.
28. On the afternoon of June 26, 2024, Elisa was transferred to the Toronto Regional Bail Centre. Hours later, she was finally met with the duty counsel at (a blonde woman in her 30s, with ear-length hair and large glasses, whose name Elisa cannot recall). Elisa told her she hadn’t breached any conditions, and pleaded with her to ask the Crown why she was being charged with a breach, and why she had consent to not talking about Sa’d and her case on social media as a condition of release. Elisa

believed this new condition to be a violation of her freedom of expression, since speaking ABOUT her own experiences of being defrauded by Sa'd did not involve any contact WITH Sa'd.

29. The duty counsel emailed the Crown on record. An hour later, Elisa was summoned from her roach-infested cell to meet with the duty counsel again, who proceeded to read out the Crown's response. Elisa was shocked to hear that the response did not come from the Crown prosecutor directly, but was instead **an email written in first-person by Caryma Sa'd, which the Crown forwarded to the Duty Counsel without any substantial accompanying comments.** The email stated that Elisa had "slandered" Sa'd and should not be released unless she agreed not to post anything about Sa'd on the internet. It bears repeating: after the duty counsel at TRBC emailed the assigned Crown to ask about Elisa's new release undertaking, the Crown didn't bother to reply in her own words, but relied on an email written by Sa'd – which claimed that Elisa had "slandered" her "professional reputation" and injured the reputation of her law firm – to explain Elisa's arrest and additional release conditions.
30. Elisa asserts that the Crown prosecutor's decision to allow Sa'd to answer the duty counsel's questions directly while Elisa sat in a jail cell because of Sa'd's lies, suggests that the Crown (a woman younger than Sa'd, who passed the bar more recently) may have been doing a favour for a more senior lawyer who claimed her professional reputation was injured, and allowed Sa'd to give input and instructions into Elisa's prosecution. Elisa argues that Sa'd's false assertions should have been dealt with in civil court rather than incur criminal charges and conditions restricting Elisa's freedom of expression, since "slander" is not listed as an offence in the Canadian Criminal Code.
31. Elisa tried to no avail to obtain a copy of the email from Sa'd that the Crown had forwarded to the Duty Counsel on June 26, 2024, but it was not provided through Disclosure or her Freedom of Information request. Elisa couldn't request the email directly from the duty counsel, since she didn't remember her name (and she had been one among several lawyers on duty that day). Elisa does not

know the protocol governing interactions between complainants of criminal cases and the Crown prosecutors assigned their cases – but she suspects that **direct interactions and communications between complainants and Crowns are not permitted as standard practice because they might skew the balance of fairness and administration of justice.** By virtue of being a lawyer herself, Sa’d would have known that such direct communications were improper, but still engaged in them.

32. Elisa asserts that Sa’d has a history of communicating directly with Crown prosecutors assigned matters involving her social media critics. After deceiving police with hundreds of lies, Sa’d was now interacting directly with the Crown prosecutor assigned to Elisa’s case. It is impossible to describe the feelings of overwhelming hopelessness and injustice that Elisa felt when, instead of receiving an unbiased response from a prosecutor, the Crown simply forwarded Sa’d’s emailed response to the duty counsel. In lieu of a Crown’s response, Elisa heard a duty counsel read a letter brimming with Sa’d’s lies and hatred towards her, before being returned to a cell with no toilet paper but plenty of roaches. Elisa felt that not only had her Charter rights been trampled on, but with Sa’d seemingly positioned at the helm of the Crown’s case, her right to a fair process was gone also.
33. Elisa’s suspicions that Sa’d had influenced and manipulated the young Crown prosecutor in her case are further underscored by inexplicable delays in the production of the Disclosure materials for her second charge (failure to comply). For over eight months, Elisa went to the expense of paying lawyers to appear on her behalf for court appearances where – again and again – the disclosure of materials was requested and promised, but ultimately not delivered by the Crown’s office. Elisa strongly believes that Sa’d had something to do with the Crown’s delay of delivering disclosure materials, in order to “stretch” out Elisa’s ordeal for at least two years so Elisa would be statute-barred from suing Sa’d for fraud. Sa’d had to have known that Elisa’s case would never go to trial and there were no prospects of conviction; Sa’d herself would probably not have wanted to subject herself to cross-examination, given the overabundance of evidence that her narrative was a lie.

34. On the morning of January 16, 2025, Elisa was contacted by 14 Division police constable Jacob McNabb (“**McNabb**”) who left voicemails and sent an email instructing her to return his call immediately. Elisa’s lawyer, Megan Schwartzenruber, phoned him back on her behalf, since Elisa was experiencing an anxiety attack. McNabb informed Ms. Schwartzenruber that her client would be charged with two more counts of “fail to comply” – again, based on Sa’d’s “evidence”.
35. A new breach charge raised the possibility, however slim, that Elisa – who didn’t have a surety – might not be released after surrendering to police. Elisa 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. Schwartzenruber 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.
36. When Ms. Schwartzenruber 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*”. Sa’d herself has compared the amount of time she spends on the phone with “police from jurisdictions across the country” (reporting critics for criminal harassment) as “a part-time job”. Elisa asserts that the notion of telling Sa’d to stop calling 14 Division hadn’t been entertained; charging someone to placate Sa’d seemed the preferable option.
37. Elisa did not find out the full details of what led to this near-arrest until July 2025, when her Freedom of Information (“**FOI**”) request to Toronto Police Services was finally fulfilled after an inexplicable four-month delay and Elisa’s escalation. The reports she obtained reveal just how extensively Sa’d lied in attempts to have Elisa 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.**

38. Elisa 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 and connected to them. Their only common denominator is that they have posted legitimate criticism of Sa’d on social media.
39. Elisa had long relinquished ownership of a domain she had purchased for Sa’d as a favour, two years earlier – “carymasad.ca”. Sa’d knew that the domain had been registered for only one year, since the **registration confirmation screenshots Elisa sent to Sa’d clearly show that Elisa did not tick the “Renew” box.** After the dissolution of their friendship, Elisa saw no reason to renew it. But McNabb never checked the identity of the current registrant. A basic WHOIS search would have confirmed that in January 2024 the domain had not been renewed by Namecheap (Elisa’s registrar of choice), and in April 2024 it was registered at GoDaddy. A production order would have confirmed that Elisa does not publish tweets from any other X/Twitter account except for her namesake, @elisahategan. And yet, McNabb was ready to charge her with TWO new counts of Failure to Comply, because Sa’d told 14 Division police 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.
40. It was only AFTER Ms. Schwartzentruber fought back and provided irrefutable evidence that Elisa was NOT the domain owner (such as emails from Namecheap’s legal department), that McNabb – whose written reports clearly show he doesn't understand how internet domain ownership works – decided to check with a colleague, cyber-crime investigator Heroux (badge 7925). This colleague was able to clear up his confusion and explain that Elisa could not be running a website and domain that she had relinquished and allowed to expire a year earlier. If McNabb had performed a thorough,

unbiased investigation, he would have checked with cybercrime investigator Heroux PRIOR to deciding to charge Elisa with two more counts of fail to comply. But he did not.

41. It took a week of intense stress, during which time Elisa made active plans to end her life, and \$3000 in extra legal fees to pay her lawyer to deal with 14 Division, before McNabb finally acknowledged – on January 24, 2025 – that there were no grounds for Elisa to be charged: she "**was not arrestable**". Elisa credits Ms. Schwartzentruber's intercessions with saving her life. Elisa asserts that if she had not been represented by a top-firm lawyer and borrowed an extra \$3000 to fight back, McNabb would have charged her. Because she didn't have a surety, instead of risking being sent to pre-trial custody, she would have killed herself that week.
42. On January 27, 2025, three days after McNabb informed Sa'd that they would NOT charge Elisa for a third time, a furious Sa'd published the Plaintiff's photograph on Sa'd's @carymarules X page, along with the photos of 8 other individuals. The common denominator: they had all criticized Sa'd on Twitter. The collage was accompanied by Sa'd's wildly irrational conspiracy theory that Elisa was part of a "criminal element" and "coordinated" with other Sa'd critics aka "harassers", crisscrossing geographical time zones, in a unified "hate campaign" to "incite hate and violence" against Sa'd.

Sa'd Used Police to Threaten Critics and Silence Legitimate Criticism

43. Sa'd's libelous post is one of several where she claims to have been in communication with Toronto Police and their Hate Crimes Unit to report people for "criminal harassment" because they threatened her "professional reputation". Elisa asserts that Sa'd's ever-growing list of "criminal harassers" contains dozens of people Sa'd has reported to police, in many cases multiple times each, since 2021 – for the crime of "slandering" her "professional reputation" on the internet.
44. Across 2022-2023 Sa'd confided to Elisa, verbally and in DMs, of her intention to instill "libel chill" in her critics by involving police and small claims lawsuits. However, Sa'd's financial shortfalls

(maintaining 3 law office spaces in the Chinatown Mall, 2 of which were empty units used as storage, while being unable to pay rent on her rental condo) steered Sa'd and Wasserman toward relying on police to frighten their critics into silence – a prospect more economical for Sa'd than having to pay for her regular counsel, Fred Wu, to keep drafting Statements of Claim.

45. On February 7 2025, the Crown prosecutor in Elisa's case, Maya Sengupta-Murray, finally spoke with Megan Schwartzenruber, Elisa's defence attorney. After a brief telephone call where Ms. Schwartzenruber communicated key facts about Sa'd's false claims and insisted on setting trial dates, Sengupta-Murray decided she would withdraw all charges against Elisa at her next scheduled court appearance on March 6. Nevertheless, Swartzenruber was adamant on booking a date for a judicial Pre-Trial, and scheduled it for the afternoon of March 3, 2025. On the morning of Monday March 3rd, three hours before the pre-trial was set to begin, Schwartzenruber phoned Elisa to tell her that Sengupta-Murray indicated she did not wish to proceed with a pre-trial and wanted to drop the charges immediately.
46. All charges against Elisa Hategan were officially withdrawn on Wednesday, March 6, 2025. Ms. Schwartzenruber read a statement on court record conveying that Elisa's prosecution was baseless, that the Crown had had no prospects for a conviction, and that the inexplicable delays in providing the Disclosure materials had taken a significant toll on her client's mental health and wellbeing.
47. On March 7, Jennifer Evans – the woman stalked by Sa'd's boyfriend – publicly announced that Elisa would appear as a witness in the civil action between herself and Sa'd. Elisa cannot control what Evans publishes; they barely know each other, have never met, and communicate infrequently.
48. Immediately after Elisa's charges were withdrawn, Sa'd contacted 14 Division police to engage in talks with Vigna about getting a peace bond against Elisa. Sa'd brazenly lied to Vigna, claiming that Elisa had made "*immediate contact*" with her after her charges were withdrawn, an outrageous lie. In

Fall 2025, Vigna would tell a 14 Division investigator appointed to research Elisa's complaints to the Law Enforcement Complaints Agency ("LECA") that Sa'd showed her an affidavit written in an effort to obtain a peace bond against Elisa. Vigna wrote: *"Immediately following the withdrawal, I received a message from [Sa'd] advising that [Elisa] had made **immediate contact** in some form using social media. This has resulted in [Sa'd] to filing (sic) private information against [Elisa] (GO # 25-562310) in which she requested a peace bond. In [Sa'd's] affidavit she states, "I am afraid of this individual, or someone under her influence, may physically hurt me or damage my property."*

49. **Elisa NEVER made "immediate contact" with Sa'd after her charges were withdrawn, and asserts that Sa'd should be charged with mischief and obstruction for this lie alone, on top of being charged for false police reports filed over a two-year span.** Elisa speculates that Vigna was particularly gullible and sympathetic to Sa'd's lies – she never fact-checked the made-up "cautions" Sa'd accused Elisa of disobeying, nor spoke with Elisa, nor allowed Elisa the opportunity to defend herself before deciding to arrest her. Subsequently, she recycled Sa'd's lies in her defence reply to a LECA investigation. Elisa believes that Sa'd considered Vigna a susceptible entry-point into TPS, a "friendly" contact she could tap and manipulate in order to enlist police to further intimidate Elisa.
50. Four days after Elisa's charges were withdrawn, Sa'd perjured herself with a baseless 810 application for a peace bond against Elisa. Elisa doesn't know if Vigna or her colleagues assisted Sa'd with the peace bond, or if Sa'd swore her Information before a justice of the peace. Either way, the application was accepted by the court – presumably because of Sa'd's law license and the veneer of credibility it conveys – even though by that time Elisa had had no contact with Sa'd for nearly sixteen months.
51. Elisa had no idea that 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, Elisa visited the website “ontariocourtdates.ca” and checked the next day’s Daily Court Lists, looking for Jennifer Evans’ name. Weeks earlier, Evans had told her that Sa’d may have filed a peace bond application against her (although Evans had yet to be served). Elisa 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’.

52. On May 14, 2025, Sa’d’s baseless peace bond applications against both Elisa and Jennifer Evans were thrown out of court at the Crown’s request, within two minutes of the matter being brought before the courts. Sa’d, who was present in the courtroom, tried to object but was cut off by the Crown. Elisa asserts that the Crown prosecutor looked disgusted with Sa’d.

BACKGROUND AND CONTEXT

The History between Elisa Hategan and Caryma Sa’d

53. Caryma Sa’d reached out to Elisa Hategan on X/formerly Twitter on [July 30, 2021](#), following an incident where 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.
54. Elisa had previously engaged in civil litigation with CAHN Chair and co-founder Bernie Farber and another CAHN member, but her claim was unsuccessful and she lost a countersuit. At the time Sa’d contacted her with questions about her legal adversaries, Elisa 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.

55. Sa'd, by virtue of being a lawyer, assured Elisa – through written Direct Messages (“DMs”) and verbally – that everything she shared was bound by solicitor-client privilege. Two years later, Sa'd would brazenly lie to Vigna, claiming that Elisa had contacted Sa'd first, to seek help in breaching a gag order and “get revenge” on her legal adversary, an egregious lie. The undeniable truth plays out in Sa'd's DMs and text messages to Elisa, which plainly show that Sa'd sought Elisa out, followed and friended her on X / formerly Twitter, sent her DMs, and repeatedly pressed her for compromising details and information on CAHN members that was not available online but was known to Elisa. At first Elisa hesitated, but Sa'd's reassurances convinced her that everything she told Sa'd was “privileged” and would be kept confidential. This turned out to be a lie too.
56. 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 scandalous 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 that Sa'd:
- 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.
57. The connection between Elisa and Sa'd quickly progressed into a close friendship and working relationship. From 2022 to September 30, 2023, they were best friends who co-authored 12 articles that were published on Crier Media and in NOW Magazine, with 3 additional articles in progress. Elisa also published a positive op-ed about Sa'd on Crier and Dean Blundell's website. The majority of the articles were published under Sa'd's name only, with Elisa acting as ghostwriter, co-writer, and/or editor without a byline.

58. The understanding between Sa'd and Elisa was that Elisa was helping Sa'd to build her "brand" as a "journalist" and social media influencer, and they would split future profits and donations. At the time, Sa'd was reticent to call herself a "journalist". Elisa mentored Sa'd on how to rebrand herself as a "journalist", giving her advice and guidance on dealing with editors, sending out queries and the general editorial process, while also serving as an informal motivational coach. By mentoring Sa'd as a "journalist" and building her "brand" to become profitable, Elisa believed that she was investing in her own future. In May 2023, Sa'd texted her, "*You are a big part of whatever success we have.*"
59. Elisa asserts that 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 Elisa generously offering to write one favourable article about Sa'd, after Sa'd contributed \$100 to her civil appeal legal costs fundraiser, turned into a year-long exploitation. In order to keep Elisa invested in labouring for her, Sa'd:
- 1) promised to help Elisa find a place to stay (Jan-June 2023)
 - 2) promised to temporarily sublet one of her vacant office spaces to Elisa at reduced cost (May 10 - June 21, 2023)
 - 3) promised to produce a podcast that would showcase Elisa's life story and correct factual errors in the lawsuit she had lost (Oct 15, 2022 - Sept 2023)
 - 4) promised to help her and others deal with cyberbullying by taking legal measures (spring 23)
 - 5) promised to start a non-profit organization with Elisa to help her generate an income through grant-writing, speaking, and fundraising campaigns (July-Sept 2023)
 - 6) promised to split "journalism" earnings and donations with her. Sa'd shared screenshots of donations she collected on their behalf, to keep Elisa motivated (Dec 2022-Sept 2023)

7) promised to share professional contacts with renowned journalists / media influencers

None of Sa'd's promises came to fruition. Elisa asserts that what Sa'd did is clear-cut fraud.

60. Sa'd's promises, combined with affectionate exchanges, strung Elisa along for over 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 "my consigliere". With Sa'd 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 – she advised Sa'd not to publish video footage captured by her boyfriend while stalking and filming unsuspecting women from a distance, not to cause a public disturbance on New Year's Eve which might have led to criminal charges, and to refrain from posting interviews with neo-Nazis or videos mocking a woman who had just been assaulted.
61. Sa'd used Elisa's ideas and words (culled from 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 Elisa's lines in podcast interviews. Then she enlisted Elisa to do research, to review and opine on various Libel Notices and Statement of Claim drafts, and to help with a Law Society Benchers Campaign. In an incredible reversal of roles, Elisa Hategan – who has no legal training – even gave Sa'd legal advice about defamation, and proofed her articles to ensure that they were defamation-proof.
62. Sa'd also sought Elisa's company on out-of-town trips. During these trips, as well as on different occasions throughout 2023, Elisa was exposed to abusive behaviour by Sa'd's boyfriend. This abuse included screaming and shouting matches where Wasserman disparaged both Elisa and Caryma, 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 Elisa after she inquired about Sa'd's promise to sublet her an empty office space.

63. Sa'd confided to Elisa – 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). Sa'd also confessed to Elisa that she wanted to enlist others in “a letter-writing campaign” to a critic's workplace. After filing several police reports against this man, Sa'd went on to file a peace bond application, which was dismissed after months of stress for the man and his spouse, and the financial burden of paying for a lawyer. Thereafter, Sa'd sued him and his employer for defamation in Small Claims court.
64. Just as how she would eventually lie to 14 Division police about Elisa, Sa'd claimed this critic was a “criminal harasser” and a threat to her and her office cats, and accused him of running anonymous Twitter accounts critical of her. In reality, there was zero proof that this man operated any of those accounts. Their civil 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.**
65. Elisa asserts that 14 Division police should have looked at the history of copious police reports filed by Sa'd, which she believes began in 2021, if not earlier, which would have identified patterns of falsehoods. For at least four years, Sa'd has accused large numbers of people of the same crime – criminal harassment – because they dared to criticize her or her boyfriend on Twitter.
66. Between 2022-2023, Sa'd enlisted Elisa in researching her critics. Sa'd's *modus operandi* involved a two-tiered approach to dealing with critics, depending on whether or not they had assets. As soon as Sa'd and Wasserman took offence to comments posted online about them, they began researching all they could about the critic, enlisting Elisa and core members of Sa'd's fanbase. They scoured the internet for the critic's footprint and look at addresses using Google Maps. Sometimes Sa'd and Wasserman staked out an unsuspecting critic's residence in person to film their house and vehicle(s). If they had assets, Sa'd would send a C&D letter threatening to sue, which occasionally resulted in

the deletion of what was Elisa contends was legitimate and fair criticism. If they didn't have money, Sa'd involved police. It was a two-tier track that led Sa'd to file over a [dozen lawsuits](#) within a two-year span, and copious police reports against more people than she had lawsuits.

67. On June 8, 2023, while sitting with them in the outdoor jacuzzi of the Brookstreet Hotel in Ottawa, Elisa was told by Sa'd's boyfriend, Adam Lee Wasserman, that he and Sa'd "had learned" from Elisa's Superior Court loss and only sued people in Small Claims court. They did not want to risk suing critics for defamation in Superior Court and potentially incurring high costs if they lost the lawsuits – so using police and peace bonds was a more economical way to scare off their opponents. At the time Wasserman told her this, Elisa had no idea that within months, she too would become one of Sa'd and Wasserman's lawfare victims.

The HateGate Fraud

68. On September 12 2023, Sa'd and Elisa published an 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. Elisa 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. Elisa reserved the Hategate domain URL and pointed it to a website Sa'd commissioned, which featured "[Make a Donation](#)" buttons. Sa'd used her popular social media accounts to solicit funding for "journalism". Sa'd collected thousands of dollars as a result. The money was collected through donation buttons, direct e-transfers to Sa'd's bank and PayPal accounts, GoFundMe pages, and other sources unknown to Elisa.
69. Despite Sa'd's promises, Elisa did not receive a cent of her share of the money. She was also not reimbursed for [travel expenses](#) after she accompanied Sa'd and her boyfriend on work-related trips, despite Sa'd having promised to cover transport costs. 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 alone wore during podcast interviews and media appearances.

70. On September 25, 2023, Sa'd enlisted Elisa to travel to North Bay along with her and Wasserman to research an investigative article about Yaroslav Hunka, a former Ukrainian SS soldier who received a standing ovation in Canadian Parliament. Sa'd promised to pay Elisa [\\$250 for the article](#), plus travel expenses. Elisa asked Sa'd about the angle of the story, and Sa'd text-messed that there were “no real parameters”. It was not until their second day in North Bay that Sa'd disclosed to Elisa that the trip funder, who paid \$1500 for the job, wanted them to “humanize” Hunka. Elisa was distressed 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 killed in WWII. The distress was worsened by online criticism of Wasserman's videos of Elisa and Caryma, with Elisa experiencing suicidal ideation after being called a “Nazi” repeatedly. Sa'd's boyfriend was angered by the onset of Elisa's depressive episode, raging that it was “a bad look” for Sa'd's “brand” as an influencer.

Blocking / Unblocking: Sa'd and Wasserman's Power Struggle Leads to Police Involvement

71. On September 30, 2023, two days after their return from North Bay, without any warning or cause, Elisa was inexplicably blocked on Sa'd's social media accounts and cell phone by Sa'd's boyfriend, Adam Lee Wasserman. It was the third time in as many months that **Wasserman had seized control of his girlfriend's accounts and [blocked Elisa against Sa'd's will](#)**. Between late June and mid-August 2023, Elisa and Sa'd resorted to alternative methods of communication behind Wasserman's back, after he hacked an email address Sa'd had reassured Elisa was private and read a confidential letter Elisa sent, where she outlined concerns over privacy and Wasserman's controlling behaviour.
72. Elisa had no reason to suspect that the September 30 block was different, since mere hours before being blocked by Wasserman, Sa'd had sent her [an affectionate email](#), telling Elisa how fortunate

she felt that she was in her life, and pleading with her to continue trusting and working with Sa'd. A day earlier, Sa'd had apologized profusely for her boyfriend's behaviour and assured Elisa that she would shield her from Wasserman – his latest derogatory emails, sent (as usual) from Sa'd's own law office email account, berated Elisa for her suicidal ideation and threatened that her work with Sa'd was in jeopardy because he “was not happy”.

73. An ex-convict with a history of uttering threats, Wasserman has a demonstrable history of seizing control of Sa'd's communications and issuing ultimatums. Contrary to Sa'd's lies to police (that her boyfriend has no internet footprint and no social media accounts) Wasserman jointly owns Sa'd's X/Twitter account @carymarules and has unrestricted access to Sa'd's social media accounts and email addresses – Sa'd's own text messages and Wasserman's emails and DMs to Elisa from Sa'd's namesake accounts prove this. 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 and abrasive emails to Elisa. Elisa firmly believes that Wasserman controls who Sa'd can communicate with on platforms and email addresses that bear her name.
74. Prior to engaging in a relationship with Sa'd in 2016 and becoming the manager of her law office (while concurrently dodging two Quebec arrest warrants that Elisa strongly believes Sa'd was aware of), Wasserman operated the (est. 2008) prostitution-related business Copycraigs, which enabled sex workers and johns to book cheap hotel rooms without paying with their own credit cards. He billed it as “The #1 service in all of Canadian adult entertainment”. Elisa asserts that Sa'd was aware of Wasserman's business, since she acknowledged it in verbal and text-message conversations.
75. In 2013, Wasserman used bitcoin to buy the prostitution review board SP411.cc / SP411.com (the initials stand for “Sex Provider 411”) and became listed as its CEO, under the alias “Chase”. Next, he billed himself as “the most powerful person in all of Ontario adult entertainment” and repeatedly

described himself as “[The Golden Jew](#)” when intimidating others, a reference to Martin Scorsese’s film *Casino*, which features a Jewish mobster, Sam “Ace” Rothstein, as its main character.

76. A [February 2020 Toronto Life Magazine article](#) describes SP411 as “The TripAdvisor of sex work”, and illustrates the role sex worker-review boards play in the lucrative underground world of prostitution and sex trafficking. One of its alleged regular members was [Matthew Elms](#), a Toronto high school teacher charged in 2014 with the sexual exploitation of an underage female student. As SP411’s CEO, Wasserman was repeatedly accused of [extorting, blackmailing](#), doxxing and [threatening sex workers](#) and johns, forcing people to pay him hundreds of dollars before he would delete SP411 accounts, and demanding money from sex workers before he would remove private details like women’s home addresses and phone numbers posted by unsatisfied/angry johns. Wasserman also spread false rumours about sex workers he disliked, who refused to pay, or spoke negatively of him, claiming they had [venereal diseases](#) or offered unprotected sex, a way to destroy their businesses because they criticized him or SP411.
77. In August 2016, Wasserman threatened to post the in-call addresses of all sex workers and escort agencies who had not paid him hundreds of dollars for site membership or advertisements – an [open extortion threat](#). He vowed to “[take over the whole escort business in Canada](#)”: “*Not only is SP411 going to take over the whole escort business in Canada with the current members that follow and the unregistered monsters, we will destroy everything in our path.*” Wasserman also threatened and doxed business rivals like “Ricky Spanish”, a ‘Ndrangheta Calabrian Mafia rival who was knocked out of competition with SP411 after York Region Police’s 2019 [Project Sindicato](#) bust.
78. In 2023, a former Toronto sex worker came forward with allegations that Wasserman hired her for her services, was affiliated with an escort agency, and rented a room from her home for “his girls” to use with clients. Elisa cannot corroborate these allegations independently, but the woman provided

screenshots of 2010 and 2011 emails to Wasserman’s Copycraigs business email, relating to the purchase of phone-verified accounts to use for Craigslist and Backpage ads. Wasserman also appears to have used Backpage ads to advertise Sa’d’s law firm business in the Female Escorts section.

79. Originally a resident of Montreal, Wasserman moved to Toronto around 2007 or 2008, evading two 2005 and 2006 Quebec arrest warrants that remained outstanding until 2017 – **effectively rendering him a fugitive from the law for 12 years, even as he worked as Sa’d’s law office manager.**
Prior to this move, he served multiple-year prison sentences in Quebec for robbery, disguise with intent, conspiracy to commit an indictable offence, criminal harassment, and uttering threats. **At the time Elisa was defrauded and robbed of her earnings by Sa’d and Wasserman, she did not know Wasserman’s real name and that his extensive criminal history spanned over two decades and involved at least 40 arrests and criminal charges, many of which include assaults, uttering threats, stealing and fraud.**
80. In April 2025, Wasserman was arrested by Peel Police and charged with assaulting a senior citizen. In May 2025 new charges of obstruction were added, because after his arrest for assault, Wasserman gave Peel Police a false name (his longstanding alias “Lee Stevenson”), a fake date of birth, and a “no fixed address” despite the fact that he has both a residential and business address – he lives with Sa’d in a domestic partnership, and is her business partner and the manager of her law practice.
Before they formally identified Wasserman, Peel Police had issued an arrest warrant for “Stevenson” and asked for Elisa’s assistance in identifying him. Elisa told them everything she knows about him. Elisa is not surprised that Wasserman was charged with obstruction for lying to police; she can only hope that Toronto police will follow suit and charge his partner in crime too.
81. Between 2022-2023, Elisa and Sa’d exchanged text messages about Wasserman’s relentless impulse for revenge against their critics, which extended to stalking and lurking outside residences to

photograph and/or film critics, and pushing Sa'd to file police reports against people who dared to speak negatively about them on Twitter. In one September 23, 2023 iMessage, Sa'd told Elisa:

“Revenge is just the garnish for me. Lee could make it the whole course lol”.

82. Throughout 2023, every time Wasserman threw a hissy fit, seized control of Sa'd's accounts and blocked Elisa, she and Sa'd resorted to alternate means of communication. In June, after Wasserman blocked her from Sa'd's Twitter account, the women switched to texting by phone and Facebook Messenger. In August, Elisa and Sa'd's plan to create a lucrative not-for-profit pacified Wasserman. When Sa'd was finally permitted to meet Elisa again, she told her that Wasserman was worried Elisa wanted to “steal her from him”. After he blocked Elisa again, Sa'd apologized profusely for his behaviour, calling it “inexcusably immature”, and pleaded with Elisa to keep working with her. Elisa had no reason to believe that the night of September 30, 2023 was any different.
83. At approximately 8 PM, Wasserman suddenly blocked Elisa's number on Sa'd's phone, while the women were in the middle of text-messaging about the article Sa'd had commissioned Elisa to write. Confused, Elisa emailed Sa'd, not knowing if Sa'd was getting her emails or if Wasserman was deleting the messages. There was no response. Elisa began to worry about Sa'd's safety, since she had witnessed Wasserman become verbally aggressive several times. Elisa suspected that Wasserman had cloned Sa'd's phone; she worried that he'd read text messages between herself and Sa'd, where Elisa denounced the abusive way that Wasserman had behaved in North Bay, telling Sa'd that how Wasserman treated them was “not right” and he was “not my pimp”. Elisa also worried because Sa'd had shared concerns that Wasserman might issue an “ultimatum” to forbid her from contacting Elisa.
84. Two days after the block, Sa'd finally responded with a brief email, writing that she no longer wished to collaborate with Elisa on creative projects. She did not inform Elisa that she did not wish to correspond with her, or that her emails were unwanted. Nor did she respond to follow-up questions

about the moneys she owed Elisa, or the lies, defamations and breaches of confidentiality included in an article her boyfriend published on October 7 on Substack, five days after Sa'd's last email.

85. On October 7, 2023, one week after Elisa was blocked on Sa'd's phone and social media accounts, Wasserman – calling himself “The Gatekeeper”, a nod to Elisa's description of him in an email he hacked – published a defamatory Substack article (“**Substack article**”) where he admits that he, rather than Sa'd, was the one to block Elisa from Sa'd's phone and social media accounts.

Wasserman's article also breaches solicitor-client privilege and discloses details about Elisa and Sa'd's friendship and private affairs. In his article, Wasserman credits his “gentle encouragement” for Sa'd getting through her bar exam and becoming a lawyer. Wasserman implies that he scared off Sa'd's ex-boyfriend and ensured “he never called back again”, and brags that he is her “gatekeeper”.
86. In his October 7 2023 Substack article, Wasserman claims that Elisa's arrival into Sa'd's life caused Sa'd to withdraw from him and shift to a deepening connection with Elisa. He admits feeling “empty inside” and jealous that the closeness between Elisa and Sa'd “looked like love”, and they had exchanged “I love you”. **Wasserman admits that he blocked Elisa on the night of September 30, 2023**, using the pretext that Elisa's suicidal ideation was a bad look for Sa'd's “brand” as a social media influencer. According to him, Sa'd had “objections” and unblocked Elisa. He blocked Elisa again. A power struggle ensued. Wasserman then gave Sa'd an ultimatum to choose between him or Elisa: “*There were objections and She unblocked. It took an ultimatum for Her to see the seriousness of my concerns.*” “*At the eleventh hour*” and under duress, Sa'd chose Wasserman – but never told Elisa what happened. Instead, she told police that she and Elisa had a “falling out”.
87. After Wasserman blocked Elisa and issued his ultimatum to Sa'd, demanding she cut ties with Elisa immediately or lose him as a boyfriend, Sa'd decided to “ghost” the Plaintiff and not compensate her for a year's labour, or split donations derived from journalism collaborations. Sa'd did not disburse

Elisa's share of earnings for articles published between 2022-2023, or reimburse travel expenses from the North Bay trip, as promised in [Sa'd's Sept. 25, 2023 text messages](#). Yet Sa'd continued to solicit [donations](#) and crowdfunded for "journalism" that encompassed Elisa's work and ideas.

88. On October 8, 2023, Elisa read [Wasserman's Substack article](#) after noticing a flurry of X/Twitter accounts sharing the URL link and talking about her. By the end of that week, a YouTube video was released by one of Sa'd's critics, titled "[Hategate: A Partnership Dissolved](#)", identifying Elisa and Sa'd as the subjects of the article. Although the article didn't disclose Elisa and Sa'd's names, dozens of unique identifiers make its lack of names a moot point. The piece is unmistakably about Elisa Hategan and Caryma Sa'd, and includes a photograph Sa'd has repeatedly published on her social media pages, showing five people who Sa'd and Wasserman count among their greatest enemies. Elisa never consented to Wasserman's disclosure of meetings or discussions she'd had with Sa'd, which Sa'd [assured her were privileged](#). Wasserman's lies and libel left her shaken and disturbed.
89. Alarmed that Wasserman had disclosed encounters and conversations she believed were privileged, on October 8, 2023 Elisa sent an email titled "[Pills](#)", which she addressed to both "Lee and Caryma" (since they share the email address), requesting the deletion or modification of certain parts of the [Substack](#) article— specifically, the false claim that Elisa had "pushed pills" onto Sa'd, but Wasserman threw them away. Elisa was upset that Wasserman had portrayed her as a drug pusher, when in fact *it was Sa'd* who convinced Elisa to share her Schedule III prescription medication, claiming she had "[undiagnosed ADHD](#)". After Elisa shared her Ritalin with Sa'd (starting in January 2023), Sa'd was disappointed that it was not Adderall, and encouraged Elisa to go to her doctor and switch her prescription to Adderall, which Sa'd preferred, calling it a "[drug upgrade](#)" in text messages.

90. Sa'd never responded to Elisa's emails – instead, she forwarded Elisa's emails to police. In Sa'd's October 14, 2023 video statement to police, AXON bodycam video shows Sa'd pointing out Elisa's "[Pills](#)" email to two male police officers sitting in front of her, characterizing it as "harassment".
91. Unbeknownst to Elisa, Sa'd had been calling 14 Division police about her since October 1st, and was busy filing multiple police reports just days apart. At that time, Elisa hadn't sent Sa'd more than 4 or 5 emails to inquire what was going on, since she had been blocked without warning or explanation as she was text-messaging back-and-forth with Sa'd about the North Bay article Sa'd commissioned her to write. Sa'd immediately proceeded to trying to have Elisa arrested for "criminal harassment", skipping the part of informing Elisa that her messages were unwanted.
92. Sa'd told Vigna and 14 Division police that Elisa's emails were unsolicited, unwelcome, and completely unprovoked, even as Sa'd's boyfriend deliberately sought to provoke Elisa with his article (which remains online as of today), and Sa'd's client MaryAnn Watson ("Watson") cyberbullied and incited violence against Elisa on X/Twitter from October 1, 2023 to mid-2024.
93. Sa'd's decision to start calling 911 (at a time when Elisa had sent her only 4-5 emails after being blocked), instead of simply tell Elisa that she no longer wished to hear from her, was a calculated decision by Sa'd intended to deflect and minimize negative publicity on X/Twitter, where Elisa was crying out about being exploited, and to discredit and prevent Elisa from suing for fraud.
94. Sa'd claimed that receiving approx. 15 emails from Elisa across a span of 3 months was "criminal harassment", even though for a whole year leading up to the day she was blocked, Elisa and Sa'd had text-messaged one another for hours daily, including the day before the block. **Sa'd never once told Elisa that her messages were unwanted.** Sa'd also knew Elisa had never been cautioned by police.
95. On October 25, 2023, after an email to Sa'd bounced and was returned with a Mailer Daemon failure, Elisa became convinced that Wasserman had blocked her IP from Sa'd's server and was deleting her

emails before Sa'd could see them. Elisa asserts that Wasserman, and not Sa'd, would have the skillset to operate private servers and block an IP, a technical expertise gleaned from operating sex industry-related websites. On SP411, Wasserman bragged that he could identify IP addresses of site visitors, could "strike at anytime", and could make someone "disappear". In 2016, he was accused of a DDOS attack on rival prostitution review board HUBGFE, formerly CAERF. Evidence suggests he may have been behind a suspected hack and data leak of TERB, another prostitution review board.

96. Unsure if her messages could get past Wasserman's self-described "gatekeeping", Elisa continued to email Sa'd, asking questions like, "*Can you see this? Are you getting this?*" Sa'd never replied – not one sentence to let Elisa know that she had received her emails, much less that they were unwanted. Behind the scenes, however, Sa'd was busy calling police over and over again about Elisa. Sa'd **insisted on filing multiple police reports with new occurrence numbers in a short span of time, i.e. one week apart** (which should have been a red flag to 14 Division that something was amiss).
97. In her October 14, 2023 video interview, Sa'd tells the two constables interviewing her that Vigna told her to file "a whole new incident report" about Elisa, rather than update the existing report. If Sa'd isn't lying about this, **it would suggest that Vigna aided Sa'd in creating the artificial impression that Elisa's "harassment" had escalated despite formal "cautions" and required additional incident reports**, during a time when Elisa had sent less than 10 emails to Sa'd (never being told they were unwelcome), and had never been "cautioned" by police.
98. Even after all her charges were unequivocally withdrawn, Elisa believes that her life has been shattered by Sa'd's malice and Toronto Police's unwitting complicity. Sa'd's lies have rendered Elisa hopeless and convinced that her life will never return to "normal". Elisa 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 Elisa either kills herself or is wrongly arrested again. It is for this reason that Elisa

feels she has no choice but to take legal action against Sa'd and the negligent Toronto Police officers who assisted Sa'd to terrorize her, but refuse to hold Sa'd accountable.

AN AVALANCHE OF 14 DIVISION POLICE ERRORS

99. The Toronto Police Service Standards of Conduct states, "*Toronto Police Service members are held to a higher standard of conduct than other citizens.[...] This higher standard of behaviour is necessary to preserve the integrity of the Service*". Elisa asserts that the officers tasked to investigate Sa'd's claims did not abide by this standard of conduct. Multiple 14 Division occurrence reports feature glaring errors that were repeated again and again in subsequent occurrence reports where different cops quoted the errors written by their predecessors. The sum effect of this "broken telephone" of errors culminated in police laying unjustified charges against Elisa Hategan.
100. Elisa emphasizes that the reports cited in the next section are **NOT** the only occurrence reports to show Sa'd's lies being recycled into statements of fact by 14 Division police. **These errors should be viewed as solid evidence of negligence, rather than a comprehensive list**, because some reports are still inaccessible. Elisa has been unable to get a copy of the perjurious affidavit Sa'd shared with Vigna, which she contends must lead to criminal charges. Nor has she been able to obtain Sa'd's emails to the Crown. Following her Freedom of Information request, TPS excluded one report from FOI release, citing an "ongoing investigation". Elisa doesn't know what other lies Sa'd sold to TPS to keep her under "investigation", but she is greatly concerned about being revictimized. **Elisa believes suing Toronto Police is the only way to ensure her safety against Sa'd's criminal actions**, and ensure that officers are held accountable for taking Sa'd's complaints at face value, while ignoring her victims' plight.

Occurrence Reports That Show Negligent Investigation

101. Occurrence Number: 23-2608706

AUTHOR: UMBRELLO, FRANCO

DATE: November 14, 2023

“On and between September 30th 2023 to November 14th 2023, the accused continued to try and communicate with the complainant through social media and numerous e-mails, **even after being told by the complainant on multiple occasions that all communication was unwanted**. Due to all the repeated communications **and the accused dismissing the complainants demands to stop**, the complainant has become fearful of this behaviour (CHARGE).”

Lies / Errors in this Report

In this occurrence report, Umbrello:

- 1) Failed to verify that the complainant told the accused that “all communication was unwanted”
- 2) Failed to verify that the accused was “dismissing the complainants demands to stop”
- 3) Erred in incorrectly stating that Elisa was “dismissing the complainant’s demands to stop”

The irrefutable lie that Elisa was “cautioned” and she “dismissed the complainants (sic) demands to stop” was used to “clear the investigation” and – as described in multiple occurrence reports – to justify the criminal charge brought against her.

102. Occurrence Number: 2023-2312449

AUTHOR: PILKEY, DIANA

DATE: Oct 10, 2023

Email from SA'D: “Elisa Hategan continues to communicate **directly** with me on social media, **despite the issuance of a caution**. [...] **I have not unblocked Ms. Hategan** at any point. [...] I am concerned that **she is ignoring the caution issued by police**.”

Lies / Errors in this Report

No police officer actually verified Sa'd's lie that a “caution” was “issued by police”, before it became recycled in multiple occurrence reports over the following two years.

Sa'd's email is inherently contradictory – Sa'd admits that she has “not unblocked” Elisa, but claims Elisa is still communicating with her “directly” on social media. If someone blocks another person on a social media platform, the other person CANNOT communicate directly with the blocker.

103. Occurrence Number: 2023-2312449

AUTHOR: REINDERS, FREDERIK

DATE: Oct 14, 2023

“The call text indicated this was related to a previously reported Harassment which **culminated in a police caution to both parties to cease communication with each other**”. [...] “threats of information disclosure and public release were seen to have continued since the report date”.

Lies / Errors in this Report

- a) No cautions were ever issued to Elisa, yet Reinders reported this as fact. Nobody at 14 Division bothered to verify this; everyone operated on the assumption that “multiple cautions” occurred.
- b) **Caryma Sa’d was formally cautioned by TPS in 2023 over unwanted contact with a critic** she had reported to police repeatedly prior to the caution being issued. The “both parties” Reinders references in his report are Sa’d and this other person. Their cautions have nothing to do with Elisa, but for whatever reason, Reinders attributes this unrelated incident to Elisa. In doing so, his report displays the errors that Elisa has come to expect from 14 Division reports.
- c) **Given the high volume of complaints Sa’d has filed against critics, 14 Division should have scrutinized their files closely, and not confused and misattributed others’ cautions to Elisa, which served to paint her in a negative light and influenced Vigna’s decision to arrest her.**
- d) Elisa never “threatened” Sa’d – she has the right to disclose that Sa’d defrauded her, allowed her boyfriend to be verbally abusive, and gave him full access to Elisa’s privileged communications to Sa’d, without consent. She also has the right to disclose illicit activities Sa’d and Wasserman have engaged in, without Sa’d trying to have Elisa arrested.

104. Occurrence Number: 2023-2842128

AUTHOR: DI TOMMASO, GIOVANNI

DATE: Dec 11, 2023

“Their relationship fell apart, and **SA’D told HATEGAN that she no longer wanted to speak with her**. HATEGAN continued to communicate with SA’D **against her wishes**, and HATEGAN was eventually arrested on today’s date.”

“Information in the text of the call advised that SA’D wished to report that HATEGAN had **breached her conditions of release by sending confidential information to a third party who had been posting it online**”.

“At 22:45 hrs, HATEGAN had made several posts on X (formerly Twitter), recounting her relationship with SA'D and **slandering her reputation** by claiming that SA'D had been engaging in discreditable conduct in her profession as a juranlist (sic). Several other parties had gained access to private message conversations between SA'D and HATEGAN, which could only be accessed by HATEGAN and SA'D.”

Lies / Errors in this Report

1. The relationship between Elisa and Sa'd never “fell apart” – Elisa was unexpectedly blocked not by Sa'd but by her boyfriend, who has full control over Sa'd's emails and social media accounts.
2. Sa'd never told Elisa that “she no longer wanted to speak with” her, or that Elisa's communications were “against her wishes”. 14 Division police officers never verified this false allegation before recycling Sa'd's lies in their occurrence reports for the following two years.

105. **Occurrence Number: 2023-2858414**

AUTHOR: TYHURST, KEEGAN

DATE: Dec 12, 2023

“However, there was a falling out between both parties and **the complainant stating to the accused that she no longer wanted communications between them**”

“Officers spoke with the complainant, who stated that she believed Elisa HATEGAN had breached her condions (sic) not to communicate with her by **posting “tweets” on SA'D's Twitter posts.**

Lies / Errors in this Report

1. There was no “falling out between both parties” – Elisa was unexpectedly blocked by Sa'd's boyfriend while working on a commissioned project, and defrauded of thousands of dollars.
2. 14 Division Police never verified Sa'd's false claim that she had “stated to the accused that she no longer wanted communications between them”
3. Elisa never “posted tweets on Sa'd's posts”. **Elisa NEVER communicated with Sa'd, directly OR indirectly, after November 2023.** The only exception has been Elisa hiring process servers to serve Sa'd with a Statement of Claim in September 2025 (which Sa'd evaded three times to date), 6.5 months after her charges had been withdrawn. Elisa could not have contacted Sa'd “directly” on X/Twitter, given the existence of mutual blocks between Elisa and Sa'd's accounts on social media platforms. A Block ensures that it is **impossible for someone to “post tweets” under the Blocker's posts, and for the Blocker to receive such messages.**

4. None of the screenshots that Sa'd gave police (as shown in Disclosure packages) show evidence of Elisa having "direct and indirect contact" WITH Sa'd. **None of Elisa's posts are addressed TO Sa'd, or contain messages intended FOR Sa'd. They are simply ABOUT Sa'd.**

106. **Occurrence Number: 2023-2858414**

AUTHOR: UMBRELLO, FRANCO

DATE: June 25, 2024

"SYNOPSIS FOR A GUILTY PLEA – On December 10, 2023, after the accused being released on an undertaking, at approximately 10:45 PM, the accused, accessed her X (formerly known as Twitter) social media account and had made several posts recounting her relationship with the complainant and **slandered her reputation** by claiming that complainant had been engaging in discreditable conduct in her profession as a journalist. **Several third parties had gained access to private message conversations** between them, which could only be accessed by the complainant and the accused. Furthermore, on December 12 2023, the complainant, had observed on her X (formerly Twitter) social media account that **the accused had been posting "replies" to her personal X posts from the accused own X account.** This form of communication **has been continuous** from the onset of the accused release, on December 10th 2023, on through with the last posted date on June 18 2024 (CHARGE)."

Lies / Errors in this Report

- a) Two parties who are mutually blocked, or after one blocks another, **cannot** communicate "directly" with one another. X/formerly Twitter (and virtually every other social media platform) have tools in place that make it IMPOSSIBLE for parties who are blocked to post "replies" to those who blocked them. Even if the Blocked person accidentally replies to a third party who tags the Blocker, NO POSTS by the blocked account will EVER be sent to the blocker.
- b) If UMBRELLO had consulted a cyber-crime investigator, he would have been advised that it is IMPOSSIBLE for a blocked (or mutually blocked) party to directly contact the blocker.
- c) When UMBRELLO writes "*This form of communication*" he is referring to Elisa posting on social media about what happened to her. Elisa was fully within her rights to post about her interactions WITH Sa'd. There were no release conditions to prevent Elisa from writing about Sa'd. Such conditions were added after her second arrest on June 26, 2024.

- d) “Slander” is not a criminal offence in the Canadian Criminal Code, yet UMBRELLO cites “**slander**” and Elisa speaking ABOUT what SA’D did to Elisa, as a “Failure to Comply”.
- e) Neither SLANDER nor Elisa speaking ABOUT her relationship with SA’D were “Direct” OR “Indirect Contact” WITH SA’D.
- f) Elisa never communicated directly OR indirectly WITH Sa’d, much less “**continuously**”.
- g) Ontario’s One-Party Consent rule stipulates that anyone can share recordings / screenshots from conversations they were a party of, as long as the information is not of a sexual/intimate nature.
- h) **Elisa sharing screenshots of Sa’d discussing wrongdoing and illicit activities in her text-messages to Elisa, is not unlawful. What is unlawful is Sa’d doing those things.**

107. **Occurrence Number: 2024-2249135**

AUTHOR: MCNABB, JACOB

DATE: Jan 15, 2025

“However, there was a falling out between both parties and the complainant stating to the accused that she no longer wanted communications between them”

NOTE: This is cut-and-pasted from TYHURST, KEEGAN’s Dec 12, 2023 report (2023-2858414).

“The complainant advised police that the accused had purchased the web domain, [carymasad.ca] in January 2023. The complainant provided officers with photo messages **confirming the accused owns the website**. The complainant advised **no one else would have ownership of this website, only the accused.**”

“On this website there are multiple linktrees to different websites. On this website there is a linktree which allows you to access the X account (formally known as Twitter) @SP411STAR which contains multiple messages directed towards the complainant and it mentions her by name.

One of the X posts that was posted on August 26, 2024, states the following, “Folks, always double check your work and verify information from sources or you end up a faildoxxing hack like [REDACTED] CHARGE #1). On November 8th 2024, @SP411STAR posts the following message, “Caryma Sa’d’s name might watermark content, but the CarymaRules footage is not filtered through Sa’d’s eyes; behind the lens lurks the gaze of King Leer.” (CHARGE #2).

Lies/Errors in this Report

- a) McNabb never verified that Elisa still owned a website domain she registered 2 years earlier but didn't renew, yet wrote in his report that he had received evidence that CONFIRMED this. In fact, the domain expired on January 25, 2024 and no longer belonged to Elisa. Yet McNabb was ready to arrest her for alleged breaches that occurred in Aug and Nov 2024.
- b) McNabb's reports clearly show that he does not understand how website domain registrations work, yet he was ready to charge Elisa with TWO 'Fail to Comply' charges without verifying with the domain registrar that she was the current owner, and/or without serving GoDaddy with a production order to disclose the name of the domain owner.
- c) Open-source information establishes there was a high probability that Elisa was no longer the owner of the domain. In spring 2024, the Registrars had changed from Namecheap (where Elisa registered the domain in 2023 as a favour to Sa'd for a period of only 12 months and did not tick the automatic renewal box) to GoDaddy. Although McNabb contacted GoDaddy to request the identification of the current domain owner (and was denied), he could have sought a production order to compel GoDaddy to release the information. He did not.
- d) Even without a production order, public websites exist where one can check domain ownerships – WHOIS.net, WHOXY.com, and other similar websites. For example, a quick search on <https://www.whoxy.com/carymasad.ca> shows that the domain had been released to the general public on Feb 2, 2024, and registered by another party at GoDaddy in April 2024.
- e) If McNabb did not understand how domain registration works, he could have contacted cybercrime investigator Heroux earlier, or brought Elisa in for questioning – which would have given her the opportunity to show emails from Namecheap which confirm she no longer has ownership of the domain. Instead, he moved to charge Elisa with TWO breaches she did not commit, based on Sa'd's contrived assurance that ***"No one else would have ownership of the website, ONLY the accused"***.
- f) Elisa does not own or operate the X/Twitter accounts referenced in McNabb's report (@SP411STAR, @Focustnv, "Dreamer", etc.), and does not know who owns/operates them. **Sa'd's false claim that she "observed" Elisa using X account "Dreamer" on her phone (but was conveniently unable to tell McNabb a date & location) is an unadulterated and boldfaced lie calculated to have Elisa unjustly arrested – and Sa'd must be charged with mischief and obstruction for it, if 14 Division cared at all about truth and justice.**

McNabb's Wednesday, January 15, 2024 occurrence report update:

"From viewing the information on evidence.com that was provided to me at the time **I was satisfied that HATEGAN had breached her release order on two separate occasions, August 2024, and November 2024.** I contacted HATEGAN's defence lawyer Megan Schwartzentruber, I advised of the allegations made and for her client HATEGAN to **turn herself in at 14 Division.**

I was advised that by the 28th of January that her client would turn herself in to 14 Division."

McNabb's Friday, January 24, 2024 Investigative Supplementary-Conclusion update

"Despite HATEGAN not being an owner of the website domain anymore, I want to ensure that she was not breaching and not operating the website."

"I contacted Toronto Police C3 investigator, D/C HEROUX #7925 regarding how domains work, I was advised that anyone can control a host domain. Regarding the website domain I was advised that HATEGAN would have control of that. Now that the website domain of carymasad.ca was expired, she [HATEGAN] would not have any control of the website."

"I advised Ms. Schwartzentruber of my findings, and to **advise her client that she is not arrestable.**"

"I did not write a production order for twitter and other social media accounts because, **I don't have the grounds to support that it is HATEGAN at this time,** from the messages provided on evidence.com it could be numerous people, and the posts could have been sent from anyone."

"I was not satisfied with everything provided that charges would be warranted at this time."

Errors in this Report Update

McNabb's statements show that he does not understand how website domains and registrations work. One cannot operate a website if they are no longer the domain owner, just as one cannot keep driving a car after the car has been returned to a dealership, sold to a different dealership, then sold to a stranger. It took Elisa paying a lawyer \$3000 to push McNabb to and conduct an "impartial investigation" – i.e. to ask for advice from a cybercrime expert, before he concluded that:

- a) "I don't have the grounds to support" (Sa'd's demand for a production order of Elisa's accounts)
- b) "I was not satisfied with everything provided that charges would be warranted at this time", and
- c) "I advised Ms. Swartzentruber with my findings, and to advise her client that she is not arrestable".

The Whitewashing of 14 Division Police's Negligence

108. On March 24, 2025, Elisa filed a Freedom of Information (FOI) request with Toronto Police for access to police reports related to her near-third arrest (ultimately she wasn't charged, so she wasn't provided with disclosure) and other lies Sa'd may have told police about her. She was told it would take 30 days for the fulfillment of her request. It took nearly 4 months, narrowing the scope of her request, several follow-up emails, and Elisa escalating to the Privacy Lead at TPS, before her request was fulfilled. When she finally received the FOI package (on July 10, 2025) she learned that one of the police reports had been withheld – TPS refused to provide it because the “police investigation had not concluded”. Alarmed to discover that she was STILL under police investigation (for unknown reasons), Elisa realized that the only way to stop Sa'd's criminal actions was to report her to police, and to file complaints against the 14 Division officers who kept taking Sa'd's lies for granted.
109. In July 2025, after reviewing her FOI files, Elisa filed three complaints with the Law Enforcement Complaints Agency (LECA) about the three 14 Division police officers involved in her wrongful arrests: Diana Vigna (LECA Complaint E-202507142020351301), Franco Umbrello (LECA Complaint E-202507282316185606) and Jacob McNabb (LECA Complaint E-202508051034274711).
110. On September 3, 2025, Elisa was notified that her complaints to LECA were screened-in and escalated to an active investigation by Toronto Police Services. TPS then assigned the investigation to Michael Mugford (“**Mugford**”), the Unit Complaint Coordinator for 14 Division. At the time she filed her LECA complaints, Elisa never realized that the investigator assigned to her case would be a colleague of the officers she reported, rather than someone with no direct connections to 14 Division.
111. On September 12, 2025, Elisa had a telephone conversation with Mugford that lasted a little over an hour. Mugford informed Elisa that the call was being recorded. Elisa hopes that is indeed the truth, and that the recording is still accessible. Long before the call concluded, Elisa became convinced that

Mugford would rule in favor of his colleagues. She asserts that Mugford came across as defensive and supportive of the three officers he was supposed to unbiasedly investigate – repeatedly arguing in their defence, acting more like a defence lawyer or union rep than an unbiased investigator. Although he had yet to interview them and hadn't received their formal statements, he was already making excuses for them. Elisa believes that Mugford was so biased, anyone who listens to the recording of their call would understand why, midway through, she broke down in tears and told him, "It seems like you've already made up your mind".

112. It would take Mugford nearly three months to formalize on paper what was obvious to Elisa within minutes of their phone call. But as she sent him more documents and waited, she struggled to figure out how and where to file her police complaint about Sa'd. As early as April 2025, Elisa was trying to find the courage to report Sa'd, a step hindered by her anxiety about dealing with police. On April 22, she sent an email to an Ottawa OPP officer she knew from their joint work in countering violent extremism, asking him to recommend detectives in the Toronto area she could approach to file a report, but he couldn't help. On June 5 she emailed a 53 Division detective to request an appointment to file a report. The detective wrote back on June 12, telling Elisa that because of jurisdiction issues she should speak with 14 Division, or with York Region police officers.

113. Elisa is terrified of 14 Division police. To date, she still has regular nightmares and panic attacks about the station and officers involved. Scared of the possibility of interacting with 14 Division, and certain that she would encounter bias there, she thought her anxiety might diminish if she interacted with a police officer who was already familiar with her story. On October 20, she made an appointment with a York Region officer she initially met in 2023, after Sa'd called the first of several wellness checks on Elisa; she had met him again in March 2024, when she filed a YRP criminal harassment complaint against Sa'd's boyfriend and client MaryAnn Watson. Elisa felt that his calm demeanour and open-mindedness would ensure she could tell her story without having an anxiety attack.

114. On October 28, 2025, Elisa visited York Regional Police's District 5 location, and met with the officer who was going to take her report. The officer was sympathetic and wanted to help. But after consulting with a supervisor, he told Elisa that she had to file her report with 14 Division police after all, because they had access to the files required to investigate, and the crimes had taken place in their jurisdiction. Troubled and upset, Elisa emphasized that she did not believe she could get 14 Division cops to listen to her, much less to investigate and prosecute Sa'd. She told him that she would rather go to any other precinct in the world than 14 Division. The officer understood her predicament and shared her concerns. He instructed her to escalate to a Staff Sergeant or to go to TPS Headquarters on College Street to file a public complaint in the event that 14 Division refused to take down her report.
115. One hour after her meeting with York Region Police, Elisa travelled to 14 Division in Toronto. She brought along a binder containing a large amount of evidence outlining Sa'd's unlawful activity. She also had a 42-page document that listed Sa'd's most damning lies, the ones most likely to result in a conviction, selected from 100s of lies Sa'd told police between 2023-2025 (*attached to Schedule B*).
116. She arrived at 14 Division around 2:20 PM. She asked to see investigator Mugford, figuring that she could meet him in person and follow up on her LECA complaints. Although he had told her that he worked until 3 PM, and the Front Desk Cop said "I saw him around earlier...", he was unavailable to meet Elisa. The Front Desk Cop (whose name she doesn't remember) asked Elisa what she wanted. Elisa told him she wanted to speak with a police officer to file a complaint. Front Desk Cop insisted on seeing Elisa's evidence, and she showed him the 42-page document. Front Desk Cop leafed through it for a few seconds, then told Elisa that it was a lot of material that would take time, and no officers were around to take her complaint. Elisa told him she had travelled all the way from York Region to file her complaint, and she wasn't going to leave before speaking to an officer. Front Desk Cop then told her to sit down and wait. One hour went by.

117. After one hour, Front Desk Cop called Elisa over and handed her a strip of paper with a number written on it. “This is your report number,” he told her. “I’ve gone ahead and made a report so you can go.” Elisa was upset. She told him that she had traveled to 14 Division to speak with an officer and file a report (rather than speak for 2 minutes with a front desk cop who didn’t jot down anything she said). She would wait all night if needed, but didn’t plan to leave before a 14 Division cop interviewed her. Elisa felt that nobody wanted to take her report and she was given a file number so she would go away.
118. The Front Desk Cop told her to wait and that someone would eventually come to speak with her. She waited nearly another hour. Finally, a uniformed officer came out into the lobby area to meet her. His nameplate listed his surname as **Reinders**. He ushered Elisa into a meeting room adjoining the lobby and placed his bodycam on the table between him and Elisa, telling her that the interview was being recorded. Elisa hopes that the video is still available and hasn’t met an unfortunate technical mishap.
119. Elisa told Reinders that for two years, nobody from 14 Division had ever wanted to talk to her – only to arrest her based on Sa’d’s lies; it was important to her to speak with even ONE cop there. Reinders said something to the effect of, “Well, you are speaking with one now.” Elisa took out her binder and explained that it was all the evidence a Crown would need to secure a conviction against Sa’d, but she needed 14 Division police to pass it onto a Crown. Elisa remarked that she recognized Reinders’ name from the files she received through disclosure. “I remember your name,” she told him, and opened the binder to a page containing a printed photocopy of his memo notes. “Yup, that’s my handwriting,” Reinders said, and read aloud what he wrote in October 2023: *“Seems Caryma more concerned about her reputation than any threats of harm to self.”*
120. When Elisa pointed out that she was arrested for “slandering” Sa’d, which is not a criminal offence, Reinders back-peddled in defense of his colleagues. When Elisa told him that Vigna had charged her without a caution, Reinders flat-out denied it. He leaned back in his chair, shook his head, and Elisa

remembers him saying something like, “Wait, you were charged with criminal harassment, right? We don’t charge people for that without a caution. I know my colleagues. There’s no way they’d charge someone without *multiple* warnings...” Elisa asserts that Reinders admits, on AXON bodycam, that 14 Division police don’t charge people with criminal harassment without any cautions or warnings. If his video doesn’t meet with an unfortunate mishap, it will show that **Vigna’s decision to arrest Elisa in lieu of any cautions surprised her own colleague, who denied such a thing could happen.**

121. Elisa told Reinders that she had trauma and PTSD from what 14 Division cops did. She said “I have a phobia of police. Do you really think I would be in here lying to you, that I’d file 3 LECA complaints and sue the police, if I was making this up?” Elisa recalls Reinders wavering, but still not believing her. After she pointed to several pieces of evidence that showed how Sa’d irrefutably lied to police, Reinders still didn’t seem to grasp why she was insistent on reporting Sa’d. “So...to clear your reputation, that’s why you’re doing this?” she recalls him asking. She replied that no, that wasn’t her primary motive, because she didn’t think it was possible for her reputation to be restored. At this point, Reinders said, “So if it’s not about your reputation, then... this is just about revenge.”
122. Elisa’s mind flashed through everything it took for her to go to 14 Division that day. The emotional toll, the hours of waiting, the attempts to brush her off, the effort it took to stand up to Front Desk Cop and insist that she wouldn’t go away until someone actually took her report. All that effort to finally compel a 14 Division officer to listen, rather than rush to arrest her. The anxiety and fear she felt, the courage she was forced to muster, to report what Sa’d did to her. Just to have Reinders look her in the face, after defending his colleagues, and accuse her of being there to get “revenge”.
123. Elisa broke down. Through tears, she asked Reinders, **“Is it revenge if someone who was beaten up calls police to report the criminal who attacked him? Is the *victim* getting revenge for reporting an assault? Because what Caryma Sa’d did to me WAS an assault. It was a mental assault, an**

emotional assault, a financial assault, an assault on my freedom, my reputation and my future.”

Reinders wavered, but Elisa couldn't stop crying – because she knew then that 14 Division police had no interest in helping her. Because she wasn't even seen as a victim, but as a wrongdoer and troublemaker who caused problems for their officers. Elisa repeated, “She defrauded me, stole from me. Exploited me. Set me up for a crime I didn't commit. She cost me \$30,000 in legal bills. She lied to you guys over and over. She is *still* filing false reports about me – bogus peace bonds, fake wellness checks. She won't stop until I'm in jail or dead. **This is not about revenge. It's about JUSTICE.**”

124. Only after Reinders gave Elisa his email address so she could get the link to the TPS evidence portal, did she realize that it was the same email address Sa'd received from one of the two officers who recorded her video statement on bodycam on October 14, 2023. Reinders was present when Sa'd lied to them about Elisa having been “cautioned” by police, and he was the cop who inputted Sa'd's lies into Police Report 2023-2312449 (*paragraph 103*). Elisa believes that Reinders' defensiveness of his colleagues (after Elisa told him that she planned to sue them) and reluctance to treat her with the dignity one would give the victim of a crime, may be influenced by his role in what happened to her.
125. Up to the date of filing this claim, no 14 Division police officer has ever contacted Elisa to follow up on her October 28, 2025 report or acknowledge the evidence she submitted through the TPS portal.
126. On November 25, 2025, Elisa received an email from professional.standards@torontopolice.on.ca enclosing 14 Division Complaint Coordinator Michael Mugford's final report, which stated in no uncertain terms that everything Elisa had reported was unsubstantiated, and there was no evidence to suggest that Vigna, Umbrello and McNabb had done anything wrong. The report was accompanied by a cover letter from Toronto Police Services' Elise Higgitt, Inspector 7661, LECA Liaison Professional Standards, which stated: “*In my capacity as the Chief's Liaison Officer, I have reviewed the results of the investigation and I concur with the Investigator's findings. Taking into consideration all the*

information we have received to date, I am of the view that based on reasonable grounds, the allegations are unsubstantiated.” Elisa was told she has 30 days to appeal this decision, and she is in the process of doing exactly that.

Critical Errors in Mugford’s Report Cast Doubt on the Integrity of Toronto Police Services

127. Mugford’s report contains several egregious errors, including but not limited to the following:

- A. Dismissing key facts and background details as “irrelevant”: “many of the documents provided by the Complainant contain allegations of criminal activity by the victim and intimate partner, which are not relevant to the complaint investigation, nor are they relevant to the original investigation that resulted in criminal charges against the Complainant.”
- B. Claiming Elisa “was aware” Sa’d had blocked her and “did not want to have any communications with her”, and Vigna had “Reasonable grounds” to arrest her, per case law R v Storrey.
- C. Falsely claiming that Elisa had “tagged” Sa’d’s social media handle, and that Elisa’s social media posts were “evidence” of criminal wrongdoing and a breach of rules she had not been given as part of her release conditions: “*Evidence was obtained showing that the Complainant had tagged the Victim’s social media handle. Further, on April 26th, 2024, the [Elisa] uploaded a social media post stating [Sa’d] was putting her legal profession to shame with manipulation, exploitation, fraud, and threats. [Elisa] also posted disparaging remarks about [Sa’d’s] intimate partner. [Elisa] tagged [Sa’d’s] professional institution on these posts. [...] After review of this evidence, by tagging [Sa’d] and her professional institutions social media handles, the Investigator believes that [Elisa] ought to have reasonably known that these communications would reach the [Sa’d], thereby breaching her conditions to not communicate directly or indirectly with [Sa’d].*”
- D. The false claim that “it is not objectively reasonable to expect police officers to be experts...in a rapidly changing field of technology”

- E. The false claim that “*The Complainant did not have to hire a lawyer and pay an exorbitant fee to provide [McNabb] with the exculpatory evidence. Once [McNabb] was made aware, he took the appropriate steps to verify the information. [Elisa] could have communicated this information to [McNabb] without a lawyer and the results would be the same. It is not reasonable to place blame on police officers conducting lawful investigations for [Elisa’s] financial and mental health struggles.*”

ERROR A: Background Details are Critical to this Case

128. Elisa disputes Mugford’s claim that background information about Sa’d’s partner’s criminal activities and criminal history, which include fraud and robbery, are irrelevant. These details illustrate a pattern of criminal activity that spans over two decades and resulted in criminal convictions and a significant prison sentence involving the same type of crime Elisa alleges happened to her – fraud and robbery. **Elisa’s arrests were precipitated by Sa’d defrauding and robbing Elisa of her earnings, and then lying to police repeatedly to have her charged for crimes she did not commit to cover it up.** Sa’d’s motives and false representations to police should have been investigated, rather than taken at face value. Elisa does not believe that an unbiased investigator could conclude that Wasserman’s criminal history and central role in the matter is “irrelevant”, either to the investigation into Elisa’s LECA complaints, or to the original investigations that led to her wrongful charges.
129. Elisa points out that in Sa’d’s October 14, 2023 video statement and ensuing emails to Vigna, **Sa’d uses sentences that sound nearly identical to lines from Wasserman’s [Substack article](#).** This suggests that Wasserman coached Sa’d, or rehearsed with her, what she would tell police when she filed her reports about Elisa. The involvement of a third party in Elisa’s wrongful arrests should have been examined. When police asked Sa’d about “Lee”, she flatly denied his involvement. Elisa maintains that Sa’d’s lies prove her malice, and cast doubt on everything else Sa’d has told police.
130. Elisa believes that Sa’d’s false accusations are coordinated from behind the scenes by Adam Lee Wasserman, a man a decade older than Sa’d, who controls what Sa’d does, where she goes, and who

she interacts with – he even bragged to Elisa that he chose Sa’d’s clothing and her “brand” look. Elisa has text messages proving that Wasserman has instructed Sa’d to write peace bond affidavits against their “enemies” – and when she wasn’t fast enough, he “punished” Sa’d by blocking Elisa.

On February 13, 2023, Sa’d text-messaged Elisa that she had to leave her apartment and return to her office at 4:30 AM to finish working on an affidavit to pacify Wasserman, who had been belligerent all night. *“It’s probably better to not be here in the morning, as an indicator that I’m taking things seriously and working on stuff,”* she told a concerned Elisa. Elisa asserts that Wasserman furthermore controls what Sa’d does with her money. In May 2023, Elisa witnessed Wasserman order Sa’d to wire money from her own bank account to a mentally ill BC client convicted of criminal harassment, who is known to have threatened Sa’d’s enemies. She complied immediately.

131. For over a decade, Wasserman – the self-avowed “most powerful person in all of Ontario adult entertainment”, a man who bragged that “outsmarting the pimps, players and hustlers is a gift”, and was repeatedly arrested for uttering threats – threatened on SP411 that he would “destroy everything in our path” if anyone stood in the way of his ambitions to “take over the whole escort business in Canada”. **Wasserman’s ambitions have now switched from the prostitution business to the goal of turning his girlfriend, Caryma Sa’d, into a famous celebrity by any means.** Wasserman told Elisa that this was his goal, while on a trip to Ottawa in June 2023. Elisa contends that to Wasserman, this means **neutralizing critics through lies, spurious lawsuits, and false police reports**. Elisa asserts that Sa’d herself is eager to follow Wasserman’s obsession with destroying their critics. By getting her detractors charged criminally or smeared as harassers through peace bonds, Sa’d ensures that their observations will be discarded as “harassment” by her audience.
132. Elisa emphasizes that Sa’d and Wasserman view themselves as different from other people, and Sa’d referred to others as “normies” who wouldn’t understand how they operated. Their idea of achieving fame is modelled on wrestling – in particular, the concept of kayfabe, where fake, staged events are

depicted as authentic – such as overblown rivalries between good guys (called “babyfaces”) and bad guys (called “heels”). Although publicly Sa’d portrays herself as a “babyface”, privately she told Elisa that she enjoys negativity and being a “heel”, and wanted to “destroy everyone” (i.e. all her critics). In June 2023, Sa’d text-messaged Elisa: “*I’m also a bit crazy. And this is the closest I will ever get to being a wrestling heel. Part of me (more than I will ever admit publicly) is having a blast, even though it’s IRL negativity rather than kayfabe.*” Sa’d also admitted she enjoys trolling – the Oxford dictionary defines “trolling” as “making a deliberately offensive or provocative online post with the aim of upsetting someone or eliciting an angry response.”

133. Elisa asserts that Sa’d is Wasserman’s ruthless proxy and accomplice – she believes that she needs his guidance to propel her to stardom. Since at least 2016, Sa’d’s law license has given a revenge-driven career criminal the necessary shield to seek retribution for any perceived slights. Wasserman directs Sa’d from behind the scenes and chooses Sa’d’s next targets for humiliation, stalking, online vitriol. He particularly likes to humiliate women who he feels disrespected him, or didn’t treat him with the respect he feels he deserves. Most of the targets of his obsession are female – Rachel Gilmore, Erica Ifill, Jennifer Evans, Deana Sherif, Gisela McKay, and many others – which by default translates into them becoming Sa’d’s targets also.
134. Wasserman was jealous of Elisa and her bond with Sa’d, and saw her as his rival. Sa’d told Elisa that Wasserman feared she would “steal” Sa’d from him. Elisa posits that it wasn’t enough to be defrauded and blocked. Wasserman wanted Sa’d to prove her loyalty to him by destroying Elisa completely, by degrading and framing her for what he had gone to prison for: criminal harassment.

ERROR B: Elisa’s Presumed Awareness of Sa’d’s Intention

135. Mugford’s assertion that Elisa “was aware” that Sa’d had blocked her is categorically wrong, because it was Sa’d’s boyfriend who blocked Elisa, not Sa’d herself – another reason why he cannot be deemed

“irrelevant” to this investigation. *Twice before in the previous months Wasserman had blocked Elisa, and Sa’d continued to communicate with Elisa behind his back. Sa’d never told Elisa that this time was different, or that her messages were unwelcome.* Elisa could not be “aware” that Sa’d blocked her, when Sa’d’s OWN BOYFRIEND bragged in his October 7, 2025 [Substack article](#) that *HE* blocked Elisa and gave Sa’d an ultimatum under duress.

136. Wasserman has unfettered access to Sa’d’s phone, emails and social media platforms, to the point he can block Sa’d from communicating with whomever makes him jealous. [Wasserman wrote messages to Elisa from Sa’d’s Twitter inbox and law office email accounts](#), proving he has access to those accounts and operates her inboxes as his own. Wasserman runs Sa’d’s law office server, and can delete Elisa’s messages and block her IP from connecting. He also runs Sa’d’s business phone-line, directs where clients send retainers, and calls himself [Sa’d’s “Gatekeeper”](#). **Elisa had no way of knowing that any of her emails were getting through to Sa’d, or being blocked by Wasserman.**
137. 14 Division police were negligent in failing to identify a third party who had done the blocking, and shares Sa’d’s email and cell phone. Vigna never gave Elisa the opportunity to introduce exonerating evidence about this third party, because her arrest was non-negotiable. Sa’d’s lie to police that her boyfriend was “not involved in any of this”, was taken at face value and unquestioned.

ERROR C: Speaking ABOUT Sa’d is not contact WITH Sa’d

138. Mugford maintains that there is “no evidence” to substantiate Elisa’s claims of his colleagues’ negligence, and claims that the evidence Sa’d submitted of Elisa’s tweets show that she “disparaged” Sa’d’s “professional reputation.” Mugford’s report conveys the erroneous impression that Elisa speaking negatively about a third party – Sa’d’s boyfriend – *after* he lied, defamed Elisa, and leaked private information about Elisa’s friendship with Sa’d, is a justification for arresting Elisa. Though they might be embarrassing for Sa’d, **none of the screenshots Elisa shared** – of Sa’d text-messages

about taking Elisa's prescription drugs, suing people according to race and sex for optics, trespassing onto private properties, stalking enemies, getting revenge on critics by suing and reporting them to police for hypothetically poisoning her office cats – **constitute contact WITH Sa'd.**

139. Elisa was never offensive or vulgar. She never used improper language to describe the circumstances of Sa'd defrauding and exploiting her. Even if Sa'd convinced police that Elisa's posts were "slander disparaging her professional reputation" – which they were not, because everything Elisa published about Sa'd is the truth – **it *still* does not involve direct *or* indirect contact WITH Sa'd. Elisa showing screenshots of Sa'd text-messaging her about illicit activities, is not unlawful. What *IS* unlawful is Sa'd doing those things.**
140. When Umbrello decided that Elisa's publication of unflattering details about Sa'd was "reasonable grounds" to arrest her for failing to comply with conditions not to make contact with Sa'd, 14 Division police became, in effect, Sa'd's PR team.
141. In a short presentation to the Toronto Police Services Board meeting on November 6, 2025, Sa'd tells TPSB that "*A broad interpretation of safety cannot be used to suppress lawful expression*". Elisa submits that this should be the *only* directive Toronto Police ever takes from Sa'd – who, since 2021, has suppressed the lawful expression of those who criticize her and/or her boyfriend's unethical actions, with contrived safety concerns aimed at pushing police into arresting her critics.
142. Elisa remembers that as far back as 2022, Sa'd and Wasserman talked of ways to persuade police to go after their critics. They were unduly preoccupied with trying to silence Twitter critics, frequently talking about filing police reports and small claims lawsuits. Among Sa'd's favourite options were peace bonds. In July 2023, Sa'd texted Elisa, "Like, we search for my name [on Twitter]. Don't talk about me = no problems". **Elisa asserts that this statement conveys Sa'd's clear intent to cause problems for anyone who speaks negatively of her.**

143. 14 Division Police did not have any evidence that Elisa contacted Sa'd, directly and/or indirectly, since November 2023, the month prior to her first arrest. There is no evidence whatsoever to show that Sa'd received any **notifications of tweets from Elisa at her @carymarules account**. The Disclosure package produced for Elisa's Failure to Comply charge **does not show ANY messages sent by Elisa to Sa'd's Direct Message inbox, and no screenshots of X notifications <https://x.com/notifications> from within the actual @carymarules account**. Police did not produce a *shred* of evidence to show that Sa'd had RECEIVED notifications, alerts, or direct messages from Elisa Hategan, FROM WITHIN her X account <https://x.com/carymarules>.
144. Elisa asserts that if you must use a fake account to stalk Elisa to find out if she posted something about you – that makes you the stalker. If you are seeking out her messages daily, you are the one interacting with Elisa's content, rather than Elisa engaging with you.
145. Elisa is not guilty of contacting Sa'd, if Sa'd chooses to stalk Elisa's content from anonymous or hidden accounts. Elisa is also not responsible for the actions of third parties who take screenshots of her content and forward it to Sa'd. **Elisa never asked anyone to take screenshots and pass them to Sa'd, and is therefore not guilty of Sa'd's manufactured "indirect" contact allegations.**
146. There is no *mens rea*, no intent, because **Elisa herself never "tagged" Sa'd's handle** and therefore never contacted Sa'd "directly". Even if Elisa accidentally replied to a third party (not to Sa'd) in a long thread where Sa'd, along with many others, was also tagged, Elisa would have been unaware. A reply to a third party is NOT a tag of Sa'd, or direct contact with Sa'd, when blocks are in place.
147. Both Elisa and Sa'd know that the social media platforms make it impossible for blocked people to interact with one another due to built-in safety tools. **If Elisa genuinely intended to message Sa'd, she would never do so via a reply on X, because the message would simply not be delivered. The**

automatic block function would prevent it – the same way as blocking a caller on your phone stops you from receiving any more messages.

148. **Elisa submits that understanding how blocking functions work on social media platforms is not high-level, technical, or specialized knowledge.** There should be no excuse for a police officer who intends to make arrests for alleged crimes that take place on social media, to not have a basic-level understanding of how such platforms are geared to run. Elisa respectfully asserts that the internet has been mainstream for the last 25+ years, and is not a “rapidly changing new field of technology”. Neither are social media platforms – Facebook was created in 2004, Twitter (now X) in 2006.
149. With more people interacting virtually and more crimes taking place online, having a rudimentary knowledge of how websites and social media platforms work is as necessary as a driver’s license. To arrest (or investigate an officer who wrongly arrested) someone for a crime that allegedly occurred on Twitter, without having an elementary grasp of how social media works, is **akin to appointing someone who never used online banking to investigate bank wire and cryptocurrency fraud.**
150. In order to clear detective Umbrello from accusations of a negligent arrest, 14 Division investigator Mugford took it upon himself to stretch the definition of “indirect” contact to encompass **all social media**. This infringes upon the Plaintiff’s constitutional right of freedom of expression. As a speaker and freelancer whose business comes from people reaching out to her through social media, Elisa’s social media accounts are tantamount to a virtual home and workspace where **Sa’d is not welcome.**
151. Both Elisa and Sa’d are mutually-blocked – that is, they have blocked each other from their respective accounts. At the time this occurred, it would have been absolutely impossible for Elisa’s posts, which are published on social media pages and accounts **specifically restricting Sa’d’s access, to have reached Sa’d.** Sa’d would’ve had to create alternate accounts for the purpose of monitoring and cyberstalking Elisa’s pages, or log out of her own account to browse Elisa’s pages anonymously.

There is no way that Elisa could have “reasonably KNOWN” that by posting on *her own* social media pages, while having blocked Sa’d and been blocked reciprocally by Sa’d, that she was STILL, somehow, communicating with Sa’d and breaching conditions that weren’t even part of her original release undertaking.

152. Nevertheless, social media posts by Elisa, which were posted on Elisa’s *own* social media pages, and which **did not tag Sa’d and did not address Sa’d** – were the reason why 14 Division police arrested Elisa for a second time, claiming she had breached her release conditions by contacting Sa’d.

ERROR D: The Internet is not a “rapidly changing new field of technology”

153. In their September 12, 2025 telephone call, Mugford told Elisa that he does not own or operate any social media accounts because “nothing good can come of them”. Elisa asserts that Mugford is wrong in his conclusion that her LECA complaints are “unsubstantiated” and her arrests were justified, given 1) he does not understand social media, and 2) he cleared his colleagues’ negligence with the excuse that expecting cops to know everything about “new” technologies is unreasonable.
154. Understanding how social media platforms operate is a critical factor in evaluating Elisa’s allegations of negligence. **But Mugford’s report does not provide input from a cybercrime expert.** The negligent decision to arrest an innocent person for a technology-based crime by a cop who lacks knowledge of said technology, was cleared by an investigator from the same division who *also* appears to share the cop’s unfamiliarity with said technology. When Mugford cleared McNabb with the excuse that “*it is not objectively reasonable to expect police officers to be experts...in a rapidly changing field of technology*”, he was **making an excuse that applies as readily to himself as it does to McNabb.**
155. In Elisa’s view, Mugford’s statement is a justification for willful ignorance. She argues that people’s lives are dramatically affected by criminal charges, by the stigma, stress, and high cost of hiring lawyers to navigate a system where the learning curve is too steep for laypeople to master without

legal training. Given the high salaries Toronto cops earn, Elisa believes there is no excuse for officers not to consult in-house cybercrime experts, or seek training, if they find themselves unable to understand the allegations brought before them.

156. In response to Mugford's justification that police officers should be excused for their ignorance of a "new" technology, Elisa argues that what would have been "objectively reasonable" in her case was for McNabb to consult with colleagues more knowledgeable about that "new field of technology". Instead, what McNabb and Mugford both rely on the R v Storrey precedent that a having a "prima facia case" is unnecessary, to **justify negligently rushing to clear investigations by way of arrest, which passes the buck to Crowns and the accused.** This places an unreasonable financial and emotional burden on a person who *could* have demonstrated their innocence, if only the police officers involved were open to examining new evidence, and to self-examination.
157. Elisa maintains that police *cannot* and should not use R v Storrey and Dumbell v. Roberts precedents as an excuse for failing to conduct a comprehensive and unbiased investigation. While R v Storrey establishes that police don't need to establish a "prima facia case for conviction" before an arrest, **it is assumed that the police officers are competent enough to make a basic assessment of the crime being alleged. This did not happen in Elisa's case.**
158. **Elisa contests DC McNabb's competency.** Before moving to arrest Elisa, McNabb could have: a) consulted with cybercrime colleagues; b) obtained a production order to compel GoDaddy to reveal the identity of whoever registered the carymasad.ca in April 2024, which would have cleared Elisa of Sa'd's false accusations; c) asked Elisa if she owns the domain. Instead, he took Sa'd's lies and "evidence" for granted and opted to proceed with criminal charges. Given that Sa'd's allegations relate to an internet crime, the officer making the call to arrest Elisa **ought to have had a base-level modicum of knowledge of how website domains are registered and operate.** If he lacked this knowledge, he should have conferred with more informed colleagues, who were available to him.

159. Elisa's innocence became obvious as soon as McNabb conferred with a cybercrime investigator and realized that Sa'd was wrong to claim that "*No one else would have ownership of the website, ONLY the accused*". The truth is, ANYBODY can register an expired domain, once it becomes available for purchase. Once an internet domain expires and is subsequently registered by an unknown party with a different registrar, its previous owner cannot still operate the domain. This is not highly-specialized, "new changing field of technology" knowledge – it's a **basic fact** that McNabb should have known.
160. **Elisa submits that it is NOT "objectively reasonable" for police who do not appear to understand a "changing field of technology" to arrest innocent people for crimes involving "changing fields of technology", without consulting with experts in that field.** A police officer ignorant of a certain technology, still deciding to arrest someone for a crime related to that technology, without consulting colleagues with more expertise, is not "justifiable from an objective point of view" (**R. v. Storrey**).
161. In Elisa's case, it happened twice – in June 2024 and in her January 2025 near-arrest. Presumably both Umbrello and McNabb have access to Toronto police cybercrime experts they could consult regarding how social media platforms blocking features and website domain registrations work. **Yet both times, the decision was made to arrest and charge the Plaintiff with crimes she did not commit, without consulting cybercrime investigators. This underscores their negligence.**
162. Elisa asserts that McNabb told her lawyer that Sa'd kept calling police about her, and he felt that he "had to do something". In Elisa's view, McNabb's decision to charge her with two counts of failure to comply before he consulted C3 investigator Heroux, was precipitated more by an **urge to placate a vociferous and obstinate complainant, than it was about conducting an unbiased investigation.** For his part, investigator Mugford did not contact Elisa's lawyer to ask about her talks with McNabb. He simply recycled McNabb, Vigna and Umbrello's defences into his report and stretched case law beyond judicial precedent to exculpate his colleagues.

ERROR E: If Elisa was unrepresented, the results would NOT have “been the same”

163. Mugford’s claim that Elisa “*did not have to hire a lawyer and pay an exorbitant fee to provide [McNabb] with the exculpatory evidence [...] could have communicated this information to [McNabb] without a lawyer and the results would be the same*” is profoundly wrong. Elisa studied criminology for four years at the University of Ottawa. She volunteered with the Elizabeth Fry Society and visited female prisoners at the Ottawa-Carlton Detention Centre. Her studies entrenched a broad knowledge of Criminal Justice System shortcomings, particularly when it comes to police and judicial bias. Given the plethora of research that shows how socioeconomic disparity and a lack of legal representation negatively impact the outcomes of persons accused of crimes, Elisa asserts there is no way she “*could have communicated information to [McNabb] without a lawyer and **the results would be the same***”.
164. There is no way that outcomes “would be the same” between an unrepresented person whom police have preemptively decided to arrest, and someone represented by a \$500+/hour partner of a law firm routinely cited in Canadian legal magazines as a Top Ten Criminal Defence Firm. Such a statement is absurd and patently false. The suggestion that McNabb would have backed off from arresting Elisa without a lawyer’s pushback is disingenuous at best. At worst, it is **indicative of a pattern of 14 Division negligence being passed off as justifiable due to repeated invocations of case law like R v Storrey and Dumbell v. Roberts, as a catch-all excuse for police carelessness.**

Such a viewpoint can have disastrous consequences for people unable to afford an adequate defence, even if they are innocent. Once an accused enters the CJS, it is much harder to escape it, which makes prevention critical. But Elisa argues that crime prevention should not rely strictly on averting crime in those at risk; it should also seek to **prevent highly-paid police officers (for whom \$30,000 may not seem like a lot of money) from making mistakes that condemn underprivileged people to a justice system geared to favour those who can afford the best representation money can buy.**

165. Perhaps Mugford’s report would come off as more credible if there was no documented history of 14 Division cops repeatedly arresting Elisa without allowing her the opportunity to respond to Sa’d’s false allegations. Every attempt she made to defend herself was summarily dismissed. **It is unreasonable for Mugford to expect *anyone* to believe that McNabb would have conducted himself any differently than his colleagues before him.**
166. McNabb did not contact Elisa to inform her that she was under investigation. He contacted her to inform her that she was going to be criminally charged and to direct her to turn herself in to 14 Division. It was only because Elisa hired a lawyer from a prestigious law firm who acted as an intermediary and argued in her defence, that McNabb was compelled to step back and conduct an “unbiased” investigation which, predictably, led to Elisa’s exoneration. If Elisa had not had a lawyer, there is no doubt that McNabb would have proceeded with a wrongful arrest. For this reason, he and **TPS are liable for Elisa’s legal fees. Elisa asserts that it is not reasonable for a cop who earned \$172,456 in 2024 to expect a jobless freelance writer to pay for his mistake.**
167. Both times she was charged criminally – December 2023 and June 2024 – Elisa did not have legal representation. TWICE, Elisa was not given the chance to defend herself against Sa’d’s false accusations. Despite her pleading, she had no recourse – neither Vigna nor Umbrello were interested in speaking with her aside from instructing her to surrender herself to 14 Division for further arrests. **It is a virtual certainty that McNabb would have followed in his colleagues’ footsteps** and wrongly arrested Elisa too, had it not been for one key difference – in January 2025, Elisa was represented by one of Canada’s most prestigious criminal defence firms, Cooper, Sandler, Shime & Schwartzentruber. Her attorney’s intercessions are the only reason McNabb was persuaded to look at exculpatory evidence and consult with a cybercrime expert, which resulted in the finding that Elisa was “not arrestable”.

Toronto Police are Accountable for Elisa's Legal Fees

168. Elisa was arrested twice and nearly a third time, temporarily detained and incarcerated, forced to borrow approx. \$30,000 for her legal defence (money she cannot repay), suffered reputational damage and the obliteration of her career as a speaker and journalist, was deprived of her Charter rights (her freedom of expression and liberty of movement were restricted for nearly fifteen months), and experienced physical and mental suffering as punishment, because:
- a) she refused to be silent about being defrauded and exploited by Sa'd
 - b) she became a defence witness for a woman stalked by Sa'd's boyfriend, and
 - c) 14 Division police officers Vigna and Umbrello became unwittingly complicit with Sa'd by arresting Elisa repeatedly, without ever giving her the opportunity to prove Sa'd was lying.
169. A search of Ontario's Sunshine List reveals that in 2024, Vigna received a salary of \$137,406, McNabb was paid \$172,456, and Umbrello earned \$200,244. Given such high earnings, it does not surprise Elisa that Toronto police officers would be indifferent to the money she spent on legal fees. But while \$30,000 in legal fees may be peanuts for police officers who earn \$200,000 annually, to Elisa – and others at an economic disadvantage – such a sum represents a small fortune.
170. Toronto Police's approach to arrest first and let the Crown and Defence sort it out later, to justify arrests on "probable grounds" (by invoking R v Storrey) rather than investigate alleged crimes thoroughly, places persons from lower socioeconomic brackets, who cannot afford to pay for legal counsel, at a **significant disadvantage**. When she applied for Legal Aid by filling out an automated questionnaire, Elisa was shocked to be denied assistance. In a follow-up phone call with Legal Aid, she learned that people without a dollar of income are routinely denied aid if they don't have prior criminal records and the offences they were charged with are not deemed serious enough to merit incarceration. As a writer and journalist, Elisa does not earn much money. What she paid in legal fees was borrowed and painfully raised. She may not have a law degree or a police department budget behind her, but she knows right from wrong. And she knows that what Toronto police did to her was wrong.

NEGLIGENCE

171. 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.
172. Toronto police are negligent in two respects: first, they arrested an innocent person following a negligent investigation (prong A). Then they let a criminal get away with a crime, when they failed to prosecute the woman responsible for Elisa Hategan's arrests, near-arrests, and ongoing malicious efforts to incite further prosecutions (prong B). A finding of guilt on either prong (A or B), or both prongs, is a finding of negligence. The Plaintiff relies on the following material facts in support of her claim of negligence:

A) Toronto Police's Negligent Investigations Led to Wrongful Arrests

- a) Toronto Police breached their duty of care by causing Elisa to be unjustly arrested because of a negligent investigation and errors made by multiple 14 Division police officers, included but not limited to Vigna, Umbrello and McNabb.
- b) Detective constable Diana Vigna abused her authority as a police officer, and breached her duty of care to Elisa Hategan, by charging her with criminal harassment for "disobeying multiple cautions and warnings" not to contact the complainant, Caryma Sa'd. **Vigna proceeded with an unjustified and arbitrary arrest without first verifying Sa'd's false claim** that Elisa had disobeyed a formal police caution, or received any message whatsoever from Sa'd to indicate that her emails were unwelcome.
- c) Before arresting Elisa, Vigna failed to fact-check the veracity of several incorrect police reports filed by other 14 Division officers who regurgitated Sa'd's lies in their occurrence reports.

- d) **Regarding *mens rea*, Vigna did not confirm that Elisa even knew whether her emails were reaching Sa'd, in light of the fact that Sa'd's email inbox, social media inboxes and phone are accessible to, and under the control of, a third party – Sa'd's boyfriend. Adam Lee Wasserman has a proven, verifiable history of intercepting and blocking Elisa's (and Sa'd's ex-boyfriend's) messages from reaching Sa'd, and confessed to doing so in a public Substack article published **two months before** Vigna wrongly charged Elisa with criminal harassment.**
- e) **14 Division police erred in failing to verify the existence of a third party / material suspect to whom Elisa had also addressed her correspondence.** During Sa'd's October 14, 2023 video interview – one week *AFTER* Wasserman published his Substack article confessing to his involvement – Sa'd shows a police officer an email titled "*Pills*". The email is addressed to "*Caryma and Lee*", and Sa'd claims that it constitutes "criminal harassment". The cop asks, "*Who's Lee?*" to which Sa'd replies that her boyfriend is not involved in "any of this". Police take Sa'd's word for granted and never speak with Elisa before proceeding with an arrest, relying solely on Sa'd's assurance that no other third party was involved in the matter.
- f) 14 Division police officers, as a collective, failed to fact-check Sa'd's lies before incorporating them into multiple occurrence reports that led to Elisa's wrongful arrests and unjust criminal charges. Sa'd's false statements that her boyfriend "has nothing to do" with her "falling out" with Elisa are absolute lies that show a pattern of deception and obstruction on Sa'd's part. **Sa'd intentionally misled police to believe that Elisa had knowingly "harassed" her, rather than admit that she allowed her boyfriend to seize control of her phone, social media accounts and emails, and block Elisa without warning or explanation, and without compensation for a year's labour, which prompted Elisa to send innocuous "*What's going on?*" emails that Sa'd reported to police as "criminal harassment".**

- g) In June 2024, 14 Division Toronto police officer Franco Umbrello decided to charge Elisa with “failure to comply” for allegedly contacting Sa’d “directly” *and* “indirectly”, which she did not do. Umbrello and his colleagues erred in determining that Elisa’s social media posts ABOUT being defrauded by Sa’d constituted contact WITH Sa’d. This is impossible, since the two women were under mutual blocks that ensured no contact could arise between them. The only way Sa’d could have accessed Elisa’s tweets is to have logged out of her own account and used anonymous accounts or incognito browsers to spy on Elisa’s social media pages, and/or to solicit members of her social media fanbase to do the same.
- h) Until new release conditions were added following her second arrest on June 26, 2024, Elisa had never been issued any release conditions not to speak *ABOUT* her arrest or relationship with Sa’d. There was no publication ban, either. The paperwork listing her release conditions simply stated that she was not to contact Sa’d directly or indirectly. This she never did.
- i) Police bodycam footage taken on the day Elisa was charged with “criminal harassment” – December 10, 2023 – shows that at the 9:25-minute mark, Vigna tells Elisa that if she breaches her release conditions, she would be charged with “fail to comply”, “*which is a more serious charge*”. Elisa tells Vigna that she understands. **At the 9:48 mark, Vigna asks, “Do you know what direct and indirect is?”** Elisa answers, “*Like, through a third-party? No, obviously not*”. Here, Elisa clearly interprets “indirect” contact as asking a third party to pass on a message to Sa’d. Vigna replies to Elisa, “*Any messages that would get to her....*” Elisa tells Vigna, “*Ok, basically like saying, Can you [she points to Vigna] tell her [Elisa points to a second female cop in the room, who is wearing the bodycam] this ... something like that?*” Vigna nods yes, that is “indirect” contact. Elisa says, “*No, of course not. Absolutely not.*” Vigna doesn’t say anything else. She just nods, affirming Elisa’s interpretation of “indirect”.

- j) Anyone who views the AXON video of December 10, 2023, can clearly see that to Elisa, her understanding of “indirect” is very literal – it means passing on a message to someone by way of a third party. This is confirmed by Vigna’s affirmation – her nodding Yes, that this is what “indirect” contact means. Vigna said absolutely nothing to Elisa about not being allowed to post on social media about what happened to her. NO conditions were placed to prevent Elisa from speaking about being defrauded by Sa’d and why she was wrongly charged. Sa’d *herself* posted on her X page that Elisa had been arrested and charged with “criminal harassment”.
- k) Neither Vigna, nor Umbrello, nor anyone else from 14 Division police, bothered to contact Elisa to let her know that **their interpretation of “indirect” contact with Sa’d had expanded to include the entire internet**, before charging her with a breach of her conditions. After being pestered for months by Sa’d, they simply decided to arrest and charge Hategan again for failing to comply with conditions she was never given.
- l) 14 Division police’s investigation was so careless, Elisa’s initial arrest paperwork listed her given name as a name that she had formally changed in 2008, over 15 years earlier.
- m) By charging Elisa with failure to comply for speaking ABOUT what Sa’d did to her, which was not listed as a condition of her release following her December 10, 2023 arrest, Toronto Police violated her rights under the Charter of Rights and Freedoms – the right to freedom of expression, the right to not suffer arbitrary arrest and detention, and the right to be treated fairly and without bias.
- n) In January 2025, constable Jacob McNabb informed Elisa (first by calling/email, then through her lawyer) that she would be charged with two additional counts of “failure to comply”. McNabb did not conduct a thorough and unbiased investigation prior to deciding to arrest her. He failed to verify the identity of the current owner of an internet domain Sa’d falsely claimed

was owned by Elisa and linked by her to a “defamatory” page about Sa’d, which Sa’d alleged was in violation of Elisa’s release conditions. It was only after Elisa’s lawyer pushed back against McNabb and provided irrefutable evidence of Elisa’s innocence, that McNabb decided to consult a TPS cybercrime expert, whereupon he concluded that Elisa “was not arrestable”. McNabb’s initial negligence and decision to arrest Elisa for something she was not guilty of, caused her intense mental distress, suicidal ideation, and an additional \$3000 in legal costs.

- o) McNabb’s erred in this case, but was inexplicably cleared by 14 Division police investigator Mugford, who claimed that *“It is not reasonable to place blame on police officers conducting lawful investigations for the Complainant’s financial and mental health struggles”*.

Elisa asserts that it is very reasonable to expect police officers to conduct comprehensive, unbiased, and lawful investigations before deciding to arrest an innocent person, rather than cause unjustified mental trauma and financial burdens for someone who has done nothing wrong, and whose income is far lesser than McNabb’s paygrade. Such an expectation is just as reasonable as expecting that a LECA complaint would be thoroughly investigated by an unbiased investigator, rather than someone whose priority is to excuse and exonerate his colleagues. Unfortunately, neither expectation was fulfilled in this case.

- p) 14 Division police failed to investigate the extremely high volume of reports and phone calls made by Sa’d between 2021-2025. This excessive number would have shown a clear pattern of Sa’d wasting enormous law enforcement resources to threaten critics across geographical time zones with police involvement, and may have prevented Elisa’s wrongful arrests.
- q) As a result of Toronto 14 Division Police officers Vigna, Umbrello and McNabb breaching their duty of care owed to the Plaintiff, the Plaintiff suffered severe emotional distress, economic losses, and significant financial damages.

B) Toronto Police's Negligent Refusal to Protect a Victim from a Criminal

- a) Caryma Sa'd has a clear and undeniable history of trying to have Elisa Hategan wrongly charged with "criminal harassment". Her January 2025 attempt nearly got Elisa arrested for operating anonymous social media accounts she does not operate, and owning internet domains she does not own. **Elisa asserts that Sa'd's actions – enabled by Toronto Police's negligence and inadvertent complicity – contravene section 140 of the Canadian Criminal Code (mischief); section 139(2)(a) (obstruction); s.423.1 (intimidation of a witness); and s.131(1) perjury (swearing false information).** Sa'd should also be investigated for criminal harassment, and for aiding BC client MaryAnn Watson's criminal harassment of Elisa, by lying to police on Watson's behalf and trying to have Elisa arrested instead.
- b) For two years, Elisa considered Sa'd her best friend and did not keep any secrets from her. As a result, Sa'd knew that Elisa suffered from clinical depression and anxiety disorder, had attempted suicide on multiple occasions, and – despite not having a criminal record – had a phobia of police rooted in her from childhood. In April 2022, after Sa'd again pressed Elisa for information that would breach her Civil court gag order, Elisa confessed that if she were ever arrested for any reason, she'd kill herself. Armed with this knowledge, between 2023-2025 Sa'd contacted police numerous, lying to authorities to have Elisa arrested over and over. In addition to filing false police reports, Sa'd called in no less than four "wellness checks", even at times when Elisa hadn't said or done anything to merit such action.
- c) Despite Elisa blocking Sa'd online, Sa'd continues to regularly cyberstalk Elisa's internet accounts, looking for any excuse to report Elisa for self-harm. After Elisa spoke out about how Sa'd had exploited and defrauded her, Sa'd spitefully went out of her way to send police to Elisa's doorstep as frequently as possible, even when Elisa hadn't expressed threats to harm herself. Sa'd feigned concern for Elisa's suicidal ideation as a pretext to inflict as much psychological harm on her as possible, knowing that her fear of police would ensure a wellness check triggered anxiety attacks and caused more harm than good.

- d) In October 2023, Sa'd endorsed and retweeted social media posts made by her BC client MaryAnn Watson, who urged the public to "Keep calling 911" on Elisa. Starting on October 1, 2023, Watson began to cyberbully Elisa, exposing intimate details Elisa only shared with Sa'd (which were leaked to Watson by Sa'd or Wasserman), and incited violence against Elisa by urging people to carve swastikas into her face. Elisa reported Watson and Wasserman to York Region Police ("YRP") on March 15, 2024.
- e) Two and a half months after Elisa reported Watson and Sa'd's boyfriend to YRP, Sa'd sent a 54-page letter to Vigna (on May 28, 2024), where she lied to cover up for Watson. Sa'd told Vigna that Elisa "threatened Watson and her family" and left Watson fearing for her safety and unable to attend her Holocaust survivor mother-in-law's funeral in fear that Elisa would "crash the funeral" and harm them. The grave "threat" that Sa'd alleged had caused Watson to fear for herself and her family's safety? This Cease & Desist note Elisa sent to Watson, her husband and adult son, the day before she went to police. Anyone who reads it can plainly see that it is not a "threat" to Watson or her family. **But by lying to Vigna and 14 Division police in claiming that Elisa had "threatened my client" and should be re-arrested, Sa'd broke the law and became Watson's accomplice in criminally harassing Elisa.**
- f) On the evening of July 10, 2025, Elisa 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 TPS, which resulted in McNabb nearly arresting her for a third time. The next day, on July 11, 2025, two York Region Police officers showed up at Elisa's door following yet another baseless wellness check initiated by Sa'd. The cops told Elisa that Sa'd reported her for threatening to jump off Leaside Bridge. There was no reason for Sa'd to initiate a wellness check because Elisa was not suicidal, and had merely written about a situation that happened seven months earlier. Elisa asserts that Sa'd called 911 and wasted law enforcement resources in order to re-traumatize her with police involvement in revenge for the article she published a day earlier, by falsely reporting suicidal ideation Elisa experienced in January as an immediate threat.

- g) While LECA complaint investigator Mugford cited *R v Storrey* and *Dumbell v Roberts* to claim that police do not need to have a *prima facie* case to make an arrest, Elisa points out that **that there IS a *prima facie* case against Sa'd. It is unreasonable, negligent, and an egregious display of bias, for Toronto Police to arrest Elisa admittedly without having a prima facie case, yet ignore and refuse to investigate a case where THERE IS prima facie evidence to indict and convict Sa'd.** Sa'd has lied repeatedly to police about Elisa, which shows intent to deceive, and *must* be criminally charged for causing Elisa's wrongful arrests, and for harassment Elisa continued to suffer after they were dismissed.
- h) **Sa'd continued to aggressively pursue police to silence and frighten Elisa, well after the wrongful charges laid as a result of Sa'd's lies were dismissed.** In March 2025, four days after the dismissal, Sa'd lied to DC Vigna with the utterly false claim that Elisa made "*immediate contact*" with her. Sa'd falsely claimed she was so scared, she needed police assistance to get a peace bond against Elisa. **This is a bona fide, prima facia case of indictable mischief and obstruction of justice, as well as criminal perjury for swearing a bogus information and affidavit.**
- i) Elisa believes that a case can also be made for criminal harassment and intimidation of a justice system participant, because on March 7, Jen Evans announced that Elisa would be a witness in Sa'd v Evans.
- j) On September 2, 2025 – the same 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 prospective client Elisa Hategan, posted a photograph of herself on X, which shows Sa'd smirking as she looks out over Leaside Bridge. Sa'd's photo is captioned by the derisive message, "*Please keep bicycles and pedestrians off the highway.*" It was the very spot where Elisa had confided to Sa'd that she planned to jump.
- k) Elisa is convinced that **without police involvement and charges being laid against Sa'd, Sa'd's behaviour will escalate and place Elisa in danger.**

Sa'd's Malice and Motive Ignored by Toronto Police

173. Elisa believes that Sa'd's ruthless efforts to have her unjustly arrested are part of an ongoing plan concocted by Sa'd and Wasserman to push her into committing suicide – to “[never be heard from again](#)”, as Wasserman threatened another woman after she complained about his abuse of sex workers. Permanently silencing Elisa ensures that Sa'd: a) keeps all the money she was supposed to split with Elisa; b) evades LSO disciplinary action; c) avoids losing lawsuits where Elisa would be summoned as a witness to testify and provide evidence against Sa'd, d) dodges a lawsuit where Elisa sues Sa'd for fraud and libel, and e) protects her criminal boyfriend from police scrutiny arising from Elisa's meticulous research into his past, and from her complaint to YRP about him and Watson.
174. Elisa is a victim of exploitation, deception, and fraud perpetrated by Sa'd, who purposely deceived Elisa into working for her for a year on the promise that she would be compensated. Sa'd made every effort to cover up the fact that she robbed Elisa of her rightful earnings, and then obeyed a jealous boyfriend's ultimatum to block Elisa without warning as a test of loyalty to him, or lose him as a boyfriend. Sa'd's strategy to get away with fraud and permanently silence Elisa, involved lying to police and filing numerous false incident reports that led to Elisa's unlawful arrests, charges of criminal harassment (a crime that Sa'd's own boyfriend spent time in prison for), a brief incarceration, and devastating emotional and financial damages.
175. Sa'd did this with the aim of causing Elisa significant distress and mental suffering, with full knowledge of her diagnoses of chronic depression, anxiety disorder, and previous suicide attempts. Elisa has no doubt that Sa'd intended to cause her so much distress that she would take her own life.
176. **Text messages exchanged between Sa'd and Elisa between 2021-2023 reveal Sa'd's discussions about prescription drugs, [lawfare, baseless lawsuits](#), and stalking and scaring Sa'd's “enemies”.** Some of these enemies were the same people Sa'd filed police reports about, lying that her critics were

part of a large conspiracy network out to defame her. Sa'd told police that these people scared her and made her fear for her safety, all the while laughing and calling them "soft" and "sheep" in text-messages to Elisa – messages where Sa'd compared herself to a "sheepdog" smarter than the "sheep" she had reported to police. Sa'd's text-messages corroborate Elisa's story and offer irrefutable evidence of Sa'd engaging in behaviour that would be considered "unbecoming" of her profession.

177. **If investigated, Elisa firmly believes that Sa'd's actions would lead to her law license being revoked and criminal charges being laid. This motive, along with thousands of dollars Sa'd withheld from Elisa, the likelihood that Sa'd would lose several small-claim lawsuits if Elisa appeared as a defence witness, and the possibility that her boyfriend might face scrutiny over his prostitution industry activities after Elisa's research identified him as the owner of SP411, are the reasons why Sa'd lied to Toronto police.**
178. Sa'd wanted Elisa to be charged with "criminal harassment" because it would cast doubt on Elisa's complaints and deflect the LSO and police from investigating Sa'd and her boyfriend. Given the no-contact release conditions that typically accompany such a charge, it prevented Elisa from suing Sa'd for fraud, an action Sa'd would undoubtedly claim was "direct contact" and "failure to comply". All Sa'd had to do was keep Elisa tied up in the criminal justice system for at least two years, and she would evade liability. Fortunately, all charges were withdrawn before Elisa's claim against Sa'd exceeded the two-year Limitations Act deadline. On September 11, 2025, Elisa filed a \$2.5M lawsuit against Sa'd in Superior Court; the Statement of Claim is attached at Schedule "B" of this document.
179. By virtue of her profession, Sa'd has the ability to earn a high income, yet she used Toronto police as a way to save money and avoid having to sue her critics in Superior Court. Sa'd told Elisa that the only way she could get a gag order to silence critics was to go to Superior Court, but she was reticent to sue outside of small claims court, unwilling to risk being ordered to pay huge court costs if she lost in

Superior Court. Sa'd told Elisa that she "didn't really care" about suing in Small Claims, because a losing party's costs were capped to a small percentage of the total claim.

180. Sa'd knew that Elisa's legal adversaries had collectively spent approx. \$300,000 to defeat Elisa's Superior Court claim, where she was partially self-represented and vastly outmatched by opposing counsel. Sa'd praised Elisa for this, even though Elisa told her it wasn't intentional – when she filed her lawsuit in 2018, she had never sued anyone before and could scarcely have imagined that legal costs could climb higher than the amount she originally sued for. Nevertheless, Sa'd offered the unsolicited advice to "Keep bleeding them" in relation to a different lawsuit.
181. Sa'd followed her own advice to "bleed" legal adversaries – in August 2023 text-messages, Sa'd told Elisa that, she intended to stretch out her small claim proceedings against a critic to a "three to four week trial" so it would be "a major hit" financially for the man, but not for Sa'd, who intended to "DIY" it. On March 17, 2023, in relation to another critic, Erica Ifill, Sa'd texted Elisa that she planned to "*have a several day long trial. As long as I can without pissing off the judge*", so that Ifill was "*gonna spend more than 5K*" in legal bills.
182. When it comes to Elisa, Sa'd knows she cannot "DIY it" in Superior Court and get a permanent gag order, because what Elisa posted about Sa'd is confirmed either by Sa'd's own text messages to her, or archived press and court records. Because Sa'd knew she was likely to lose in Superior Court, where costs would be higher and Elisa would reveal facts that could cost her law license, Sa'd opted to silence Elisa by tapping into her greatest fear: her fear of police.

Victim and Villain – a Reversal of Roles

183. From 2023 to 2025, Sa'd lied over and over to police in relentless efforts to silence Elisa. After years of filing baseless police reports and trying unsuccessfully to have critics charged with criminal harassment, in 2023 Sa'd hit gold – she was finally able to convince an unsuspecting, young female

cop that she was such a bona fide victim, there was no need to corroborate her claims. In sum, a **criminal was able to persuade a cop that the victim was the villain, and the villain was the victim.**

184. The decision made by that unsuspecting, young, second-generation female cop would trigger an avalanche of errors within 14 Division Toronto police. It would lead to Elisa's two arbitrary arrests, a near-third arrest, two years of sleepless nights, panic attacks and suicidal ideation, financial hardship, life-altering PTSD, and worst of all – the breathtaking, non-stop fear that at any moment of any day, police could show up on her doorstep to throw her in jail. All because Sa'd abused her authority as a lawyer to convince three Toronto Police officers – Vigna, Umbrello and McNabb – that she was trustworthy enough to skip a comprehensive investigation before making an arrest.
185. Elisa asserts that **it is shocking and unacceptable for Toronto Police to willfully turn a blind eye to Sa'd's criminal actions. Criminal laws should be applied equally to all citizens, and not be selectively enforced.** Wrongdoings perpetrated by police, members of the Court, or "influencers" and celebrities, should be as rigorously punished as those committed by offenders who don't have connections to media, police, the courts, or positions of authority. If anything, alleged wrongdoings committed by people appointed to powerful and influential positions should be *more* strictly scrutinized because of the power (and corresponding risk of abuse) wielded by those professions.
186. Elisa has been traumatized by Sa'd's actions and Toronto police's unmerited, bizarre servility to Sa'd, which came at the cost of depriving Elisa of her Charter Rights. It is a servility made all the more inexplicable because of how Sa'd and her boyfriend regularly use Toronto police as props to advance Sa'd's 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. Sa'd's video went viral and

landed on the front page of the Toronto Sun – this, in turn, resulted in more followers, publicity, donations, and Twitter ad share revenue for Sa’d and her career criminal boyfriend.

187. Elisa is concerned that Toronto Police are giving preferential treatment to Sa’d and are reluctant to charge Sa’d with a criminal offence – despite evidence that proves Sa’d broke the law multiple times – due to a misguided perception that Sa’d’s high profile on social media and large fanbase may cause negative publicity for Toronto Police and castigate them in a negative light, as Sa’d has done on prior occasions. This perception may be heightened by Sa’d’s connections to vociferous TPS critics like Rebel News reporters Ezra Levant and David Menzies, Warren Kinsella, Sue-Ann Levy and Toronto Sun’s Joe Wormington, coupled with endorsements from conservative politicians and lobby groups, who latched onto Sa’d in the past year because of her disparaging footage of pro-Palestinian protests.
188. Elisa asserts that **Toronto police should do the job they were mandated for and protect victims of crimes, rather than overlook illegal acts committed by “important” or “influential” suspects.** She points to Sa’d’s former friend, disgraced ex-lawyer James Bowie, who had an even larger Twitter following than Sa’d. In July 2025 Bowie was sentenced to 4 years in prison for threatening, extorting and harassing an ex-client. The key differential here is that Bowie’s victim was helped *pro bono* by prominent Ottawa lawyer Michael Spratt. Elisa has no prominent Toronto lawyers to defend her interests and aid her *pro bono* in pressuring Toronto police to do their jobs.
189. Elisa feels like she is living in a Kafkaesque universe for wishing to have been interrogated by police – because at least if she had been brought in for questioning, rather than arrested immediately for disobeying “cautions” that don’t exist and breaching conditions she didn’t breach, she would have had a chance to defend herself. **Even as she is writing this Statement of Claim, Elisa is afraid she will be arrested for suing the police.** But she knows that if she doesn’t hold TPS accountable, Sa’d will

eventually convince another Vigna, Umbrello and McNabb that innocent people should be sent to jail for “slandering” a lawyer.

190. As a destitute writer, Elisa cannot afford to pay exorbitant legal fees for criminal or civil defence work, or to hire a lawyer to assist with a private prosecution of Sa’d. Unfortunately, largely due to 14 Division police’s refusal to investigate Sa’d’s criminal actions, Elisa – the true victim in this ordeal – is now forced to sue the Toronto Police, and Sa’d, in Civil court. A more appropriate venue for a victim to seek justice would be Criminal court, where Sa’d could be held accountable for her actions, but Toronto Police’s negligence and failure to prosecute Sa’d has made this impossible.

An Insurmountable Conflict of Interest

191. Through their actions (or lack thereof), **14 Division police have made it abundantly clear that they have no interest in investigating, much less prosecuting, Sa’d for her criminal activity.** Their defence of Sa’d and her criminal acts (as evidenced by Vigna’s statements to Mugford, and his report clearing his colleagues of wrongdoing) is directly correlated with 14 Division’s insistence that they did nothing wrong, which hinges on passing off Elisa’s complaints as “unsubstantiated”.
192. Determining that Elisa’s complaints to LECA are “unsubstantiated” hinges on portraying her as a vindictive wrongdoer who merited arrest, and the officers named in the complaints as hard-working cops who did their jobs by the book and had “reasonable grounds” to arrest her – which they did not. **It is not in 14 Division’s best interest to establish that Sa’d lied to them, because it would necessarily give rise to the question of whether the officers who made arrests based on Sa’d’s lies may have been negligent and failed to conduct a thorough investigation.** For this reason, Elisa suspects that 14 Division will continue to turn a blind eye to Sa’d’s criminal activity.
193. Elisa asserts that it is difficult, if not impossible, for 14 Division police to act upon her complaint about Sa’d’s criminal activity without bias, while also defending three fellow officers whom Elisa accused of

negligence for not having verified Sa'd's claims before proceeding with an unjustified arrest. It is a zero-sum scenario – if Elisa is right, their colleagues may face disciplinary measures. If they dismiss her complaints to LECA as “unsubstantiated”, nothing happens to them. Elisa asserts that 14 Division chose the “unsubstantiated” route in order to protect their officers from a disciplinary hearing and potential finding of misconduct. But by doing so, Elisa was treated without the respect and dignity befitting a victim of a crime.

194. When Elisa filed her complaint against Sa'd at 14 Division on October 28, 2025, she was treated dismissively and accused of acting in ‘revenge’ by an officer who *himself* had interacted with Sa'd and regurgitated Sa'd's lies in his police reports. As one of the two male officers who interviewed Sa'd on October 14, 2023 and recorded her video statement on bodycam, DC Reinders was there to witness Sa'd lie that Elisa had disobeyed “cautions by police”. He then inputted Sa'd's lie into report 2023-2312449, which contributed to Vigna's decision to charge Elisa with criminal harassment. **He *himself* had contributed to the broken telephone chain that had led to Elisa's wrongful arrests.**
195. Elisa asserts that arresting Sa'd would cause Toronto Police greater embarrassment than looking the other way and failing to protect Elisa and other victims. TPS would be forced to admit that Sa'd has lied to officers across Ontario since 2021, and even to Toronto Police's Hate Crimes Unit. **Countless people have been named in unfounded police reports and baseless peace bond applications filed by Sa'd in efforts to have critics arrested for “slander” and “criminal harassment”.** Elisa knows of at least four other persons Sa'd told identical lies about to police, and firmly believes more will be discovered if only police would conduct a side-by-side comparison of Sa'd's reports. Innocent people's names have been recorded in police reports and CPIC, which may affect future employment or security clearances, on Sa'd's word alone. The lives of untold people are being sacrificed to protect the reputations of three police officers who are unlikely to incur any significant consequences as a result of admitting an error.

196. 14 Division Toronto Police's inexcusable reluctance to investigate Sa'd's unlawful activity and waste of public resources is a **betrayal of the community they are supposed to defend, the city they swore to protect, and the laws they are expected to uphold**. TPS' justification of unjustifiable arrests and denial of investigatory negligence reduces their risk of a lawsuit, whereas an apology or admission of wrongdoing may leave TPS and officers involved open to liability. This insurmountable conflict of interest has caused Sa'd's criminal actions to go unpunished, while her victim continues to deal with emotional and financial aftereffects. Just as when she was 18 years old and testified against 3 criminals but was unable to get witness protection, Elisa believes that police failed to protect her again.
197. Elisa did everything in her power to report Sa'd to a different police force, only to be told repeatedly that she *had* to go to 14 Division, the geographical region where Sa'd's crimes of obstruction and mischief had occurred. By the time Elisa found the courage to file a report about Sa'd at 14 Division, a LECA investigation was ongoing and involved three detective constables, one of whom (according to Ontario's Sunshine List) is on a higher pay grade than the investigator assigned to investigate him.
198. 14 Division Police's failure to prosecute Sa'd for what she did to Elisa has had dire consequences for Elisa's ability to feel safe and recover from the trauma she incurred as a result of Sa'd's unlawful acts and Toronto Police's negligence. It took Elisa many years to overcome her childhood police phobia. In the last decade, she served as a consultant with the London, UK-based Institute for Strategic Dialogue (ISD) and assisted law enforcement agencies like Ontario Provincial Police and Probation Officers Association of Ontario with advice on how to prevent radicalization and extremism in youth. Now, her prospects of doing similar work are hindered. Her arrests, charges, and the large volume of false police reports Sa'd filed about her, which are still recorded in the Canadian Police Information Centre (CPIC)'s database, have destroyed her reputation in the law enforcement community and may prevent her from gaining work that requires security clearances. Although she has applied to have her photos and fingerprints destroyed, to date her biometric data remains in the system.

199. Elisa Hategan has the right to pursue legal accountability – both against Sa’d and the Toronto Police officers who failed to adequately investigate Sa’d’s lies before they wrongly arrested her – without being accused of “seeking revenge” by 14 Division cops reluctant to believe that Elisa is a victim. Their reluctance to view Elisa as a victim **is an overt expression of an underlying 14 Division police bias** against Elisa that is undoubtedly tinged by the existence of no less than three LECA complaints filed by her against their officers. Nevertheless, 14 Division’s refusal and/or failure to investigate a reported crime – a key mandate of their profession – is a gross violation of Elisa’s right under section 15 of the Canadian Charter of Rights to receive equal protection under the law.
200. **14 Division police’s insistence that they had proper grounds to arrest Elisa Hategan is a case of throwing the baby out with the bathwater. Except the baby is a criminal (Sa’d) getting away with fraud and using police to intimidate her victim, and the bathwater is the whitewashing of a negligent investigation that led to Elisa’s wrongful arrests.**

For TPS to acknowledge what they did to Elisa Hategan is to acknowledge their own failure, and to admit that their colleagues made a mistake. It’s easy to ease a conscience by blaming a victim, especially when the weight of truth depends on the perceived worth of those who speak it. **But when the denial shatters an innocent person’s life and places her at risk of future victimization from a criminal hiding behind your refusal to admit that you were deceived, it is time to make amends. To do the right thing, you must acknowledge that something went wrong.** To do otherwise is to fail the obligations to truth and integrity that a police officer commits to when he or she embarks upon a career as a defender of law and a champion of justice.

Schedule “B”

Tab	Description
1	Legal Expenses incurred between December 2023 – August 2025
2	42-page chart itemizing Sa’d’s unlawful lies to 14 Division police. Contains embedded links to material evidence for mischief and obstruction charges. Submitted to TPS Evidence Portal on October 30, 2025
3	Document titled “Caryma Sa’d Lies to Police About Her Boyfriend’s involvement” – Transcript of text messages between Sa’d and Elisa Hategan discussing Wasserman seizing control of Sa’d’s communications to block Elisa Submitted to TPS Evidence Portal on October 30, 2025
4	Stalking videos of Jennifer Evans sent to Elisa Hategan by Caryma Sa’d
5	Correspondence from Sa’d to 14 Division Police
6	Adam Lee Wasserman’s Criminal History from Quebec (not including recent ongoing charges for assault and obstruction of justice in Ontario)
7	Toronto Police Reports obtained through Freedom of Information, showing Caryma Sa’d repeatedly lying about Elisa Hategan to have her arrested
8	Letter from Law Society of Ontario (LSO) sanctioning Sa’d for engaging in harassment and in behaviour that brings discredit to her profession
9	Text Message from Caryma Sa’d to Elisa Hategan indicating incorrect belief that critic Keven Ages operated anonymous X/Twitter accounts critical of her
10	Social media posts by Caryma Sa’d acknowledging she “caused harm” by posting false allegations about a critic, as part of a lawsuit settlement
11	Jan 28 2025 X/Twitter post by Sa’d falsely accusing Elisa of “inciting hate and violence” against Sa’d and “conspiring” with 8 random people to “criminally harass her”
12	Screenshots of text message by someone Sa’d sued, alleging Sa’d offered to drop her lawsuit in exchange for false testimony
13	Sa’d’s introductory message to Elisa and assurances that their conversations are bound by solicitor-client privilege
14	Text message from Elisa Hategan to Caryma Sa’d discussing her phobia of police and intention to commit suicide if she was ever arrested
15	Photos and videos filmed by Sa’d and Wasserman showing them trespassing at a suspected critic’s house at 4 AM, sent to Elisa Hategan by Caryma Sa’d
	Text messages from Sa’d to Elisa discussing her intent to write a poison-pen defamatory article about Jennifer Evans, who she sued in Small Claims court
16	Text messages from Caryma Sa’d showing it was HER idea to accuse critics of being threats to poison her cats – she repeated this lie to police when filing reports against at least 4 separate individuals, including Elisa Hategan
17	Text messages from Caryma Sa’d to Elisa Hategan, discussing Sa’d’s lawsuits and intent to libel chill, to humiliate critics, and rake up legal bills

18	Text messages from Sa'd to Elisa where Sa'd discusses intimidating and scaring her critics (some of whom she reported to police for "harassing" her), trolling her enemies, and "kayfabe"
19	Text message from Sa'd to Elisa, discussing Sa'd's idea of a "letter-writing campaign" to a critic's workplace in hope of getting him fired
20	Text message from Sa'd to Elisa, where Sa'd claims she has "undiagnosed ADHD"
21	Text messages between Sa'd and Elisa discussing prescription meds and Sa'd praising Elisa for "upgrading" her prescription medication to Adderall
22	Caryma Sa'd calls Elisa Hategan her "consigliere", attributes success to her
23	List of articles produced through Sa'd and Elisa's collaborations
24	Caryma Sa'd promises to create a podcast about Elisa Hategan
25	Text messages between Sa'd and Hategan discussing Wasserman's revenge streak and penchant for retribution
26	Text message discussions between Sa'd and Elisa about the not-for-profit organization they were planning to register
27	Text messages between Caryma Sa'd and Elisa Hategan after Sa'd's boyfriend Adam Lee Wasserman seized control of communications between the two women and blocked Elisa against their will – June and Sept 2023
28	Sept 2023 Text messages from Caryma Sa'd to Elisa Hategan discussing the donations they would earn from their article The Hategate Affair
29	X/Twitter posts by Caryma Sa'd soliciting donations for The Hategate Affair and social media posts by people who donated
30	September 25, 2023 text messages from Sa'd to Elisa enlisting her to travel to North Bay and offer of compensation and costs reimbursement
31	Elisa Hategan's transport costs to/from North Bay not reimbursed by Sa'd
32	Messages from Sa'd to Elisa between Oct 2022 – Sept 30, 2023
33	October 7, 2023 Substack article by Sa'd's boyfriend Adam Lee Wasserman acknowledging he blocked Elisa Hategan and issued ultimatum to Sa'd
34	1994 articles about a 14 Division police officer charged with discreditable conduct under the Police Services Act as a result of Elisa Hategan's affidavit
35	October 14, 2023 14 Division Police interview with Caryma Sa'd - AXON video
36	December 10, 2023 14 Division Police video showing arrest of Elisa Hategan
37	Bruises on Elisa's wrist from June 26, 2024 arrest – photos taken June 27, 2024
38	Elisa's notes about her June 26 arrest, written on the morning of June 27, 2024
39	Sa'd smirking on Leaside Bridge, where Elisa told her she planned to jump – photo posted 2 weeks after Sa'd's July 2025 malicious wellness check on Elisa
40	Sa'd's last email to Elisa, Oct 2, 2023 – the <u>first</u> person she BCC's is MaryAnn Watson, who immediately began harassing and terrorizing Elisa online, starting on that exact day.
41	Threats and extortions by Sa'd's boyfriend Adam Lee WASSERMAN on his prostitution-review website SP411, using the aliases CHASE and COPYCRAIGS
42	Sa'd advertising legal services in Female Escorts section of Backpage (now defunct)
43	Elisa Hategan's Sept 11, 2025 Statement of Claim in 2.5M Lawsuit against Sa'd