

Court File No. CV-18-00610489-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

**B E T W E E N:**

**ELISA ROMERO HATEGAN**

Plaintiff/Defendant by Counterclaim

and

**ELIZABETH MOORE FREDERIKSEN and BERNIE FARBER**

Defendants/Plaintiff by Counterclaim

**AFFIDAVIT OF ELISA ROMERO HATEGAN**

I, Elisa Romero Hategan, of the City of Toronto in the Province of Ontario, MAKE OATH AND SAY:

1. I am the Plaintiff/Defendant by Counterclaim in this action. As such I have personal knowledge of the matters to which I testify in this Affidavit, except where my testimony is expressly stated to be on information and belief, in which case I state the source of my information and belief, and I believe the testimony to be true.
2. This affidavit is sworn in response to Elizabeth Moore aka Elizabeth Frederiksen's affidavit and the Defendants Elizabeth Moore and Bernie Farber's Motion to dismiss my action. Herein I will reply to those matters I see as relevant to the subject matter of the Statement of Claim I filed in Ontario Superior Court on December 10, 2018 and revised as Fresh as Amended on February 11, 2019, and to Elizabeth's countersuit and allegations of defamation. Where I do not specifically address an allegation made in Elizabeth's affidavit, I deny that allegation, put her to strict proof thereof, and reserve the right to respond with more particularity at a later date should it become necessary to do so.

### **My Recruitment and Role in The Heritage Front**

3. I was born in Bucharest, then-communist Romania in December 1974, and lived there until age 11. My parents were both deaf, and suffered enormous abuse in their childhoods due largely to the then-commonly held perception that people with disabilities were not valuable members of society. My father, Iosif Hategan, clawed his way from being called the village idiot in his Transylvanian village to becoming the president of the Romanian Deaf Association. My mother, Lucia Hategan, was assaulted at age 12 or 13 by village boys, which led to her being sent to a state-run facility for deaf girls, where she met my father (who was an art teacher). My parents' experiences hardened them and made them frequently lash out at each other. Physical and emotional violence was a common occurrence in our family.
4. When I was 9, my mother defected from Romania while on a trip to a deaf conference in Italy, where she asked for political asylum. She made her way to Canada and applied to sponsor my father and me under the Red Cross family reunification program. My father and I joined her in Toronto in September 1986, when I was 11 years old. At that time, I was known by my birthname of Elisse Charlene Hategan; I legally changed my name in 2009.
5. While living in Bucharest in the care of my father (between ages 9-11), my father made it clear he didn't want a child. As a result, I was frequently locked out of our apartment and left to fend for myself on the streets. I was able to overcome the neglect thanks to the generosity of a neighbour across the street, Eugenia Ganciu, who fed me and gave me shelter after dark. She was my best friend's grandmother, and the first person in my life to teach me about compassion and kindness.
6. After we arrived in Canada, my father disliked his new life here and had problems understanding and learning a new language. In 1988 he decided to return to communist Romania, where he died

shortly after. I was 13 years old. My mother and I were allocated a subsidized apartment at 285 Shuter Street, a community housing building in Regent Park. While living there, she was violent and physically abusive toward me. I recall the Children's Aid Society first becoming involved with us after Mr. Godlewsky, my 5<sup>th</sup> grade teacher at Park Public School, called the police when I showed up in class after lunch crying and with bruises. I was assigned a CAS social worker, Ms. Shanti Persad, but I was not removed from the home at that time.

7. At age 14, I ran away from home and ended up in the care of the Children's Aid Society, spending the next 1.5 years in a couple of group homes and foster care. At one point, while living in a group home on Browning Avenue in the city's east end, I was the only white girl there. I felt isolated and bullied by the other resident kids, who teased me because I didn't fit in. At the time, I felt they were picking on me because of my race, although in retrospect I now believe that the bullying was more related to the fact that I didn't know much about pop culture or rap music, often still wore my hair in braids, and came across as a stereotypical "nerd".
8. After running away from a foster home I was transferred to, I decided to return to my mother's apartment. I dropped out of school near the end of grade 9 – that year I had transferred schools twice, due to moving from my Browning Avenue group home to the foster home in Pickering, and I didn't want to enroll in a new high school for the third time in one semester.
9. Back at my mother's apartment at 285 Shuter street I was lonely, had no friends and no hope that things could get better. My mother, who worked full-time as a data input clerk at CIBC, did not enroll me in any extracurricular programs since she couldn't afford the extra fees. I missed Romania and didn't feel I belonged in this country. I had come from a rigid communist dictatorship that enforced conformity and punished those who stood out. To me, Canada seemed to demand the

opposite – individuality and multiculturalism – and I was lost. I had no self-esteem, no confidence, and didn't feel like I belonged anywhere.

10. At age 16, in the fall of 1991, I watched an American television program that was interviewing a young man from Toronto who was speaking about taking pride in his European heritage. He argued that other races and cultures were able to freely celebrate pride in their ethnicity, but that there was a double standard against white people. His words resonated with me – he didn't "look" like what I had imagined a neo-Nazi would be like; he wore a suit and appeared clean-cut and non-threatening. When the television show flashed the address of a US nationalist group's PO Box, I wrote it down and sent them a letter asking for more information. Within weeks, they replied by sending me the address and telephone number of a nationalist group in my area – the Heritage Front.
11. In 1991, the Heritage Front was just starting to establish themselves as a "white rights lobby group" that would eventually become Canada's largest neo-Nazi white supremacist group to date. They operated primarily by disseminating their racist messages via a telephone hotline in Toronto. People calling their number would hear messages that were rotated every few days. From what I recall, the messages consisted of such themes as calling for an end to immigration, to affirmative action, to welfare handouts, and support for the "boys in blue" – at that time, the Toronto Police Services were being accused by community activists such as Dudley Laws of the Black Action Defense Committee of racial profiling and illegal strip-searches of innocent black women.
12. After a few days of listening to the hotline messages, I worked up the nerve to leave a message on the hotline. That same day, a man named Wolfgang Droege called me back – he represented himself as the Heritage Front's public leader, and one of three men who ran the organization. The other two were Grant Bristow, a co-founder of the Front who in 1992 also appointed himself the "Intelligence

Chief/Director”, and Gerry Lincoln, who was primarily in charge of the hotline and “Up Front”, the HF’s upcoming magazine publication, which would have its inaugural release that December.

13. Wolfgang and I arranged to meet that week, on a Tuesday evening in front of the Eaton’s Centre. His friendly demeanour put me at ease, despite the fact that he was an adult and I was a fairly naïve teenager who had never even gone on a date. He assured me that the Heritage Front was a political lobby group gaining in strength, and that one day he would replace Preston Manning as the leader of the Reform Party. As someone who didn’t know much about the politics at the time, I had no reason to doubt him. Almost overnight, Wolfgang became my father figure and mentor for the length of my stay in the Heritage Front. I didn’t know it at the time, but soon learned that he was a former Klansman and member of the US terrorist group The Order, who had an extensive criminal record for drug offences and for attempting to overthrow the Caribbean island of Dominica in a failed coup attempt, known as Operation Red Dog, intended to turn the island into a white ethnostate.
14. My trajectory in the white supremacist movement was rapid – a month after joining the group, I started to record messages for the official hotline; three months after, I was speaking at my first Heritage Front rally, held on December 7, 1991. I was still sixteen years old. All Heritage Front rallies were videotaped, with the tapes selling via an order form at the back of their magazine, and via hard copies sold at rallies. My role inside the group is extensively documented through the Front’s own material – their magazine Up Front, and my participation as a speaker in at least three rallies between 1991 - 1993 that were all videotaped and marketed to supporters: 1) Martyrs’ Day – December 7, 1991; 2) WAR in Toronto - June 1992; 3) Roma Restaurant - November 13, 1992.
15. Before the year was out, I was introduced to Wolfgang’s good friend and fellow German expatriate, Ernst Zundel. I was still 16. Shortly afterwards, I began to work for Zundel – I was his “girl Friday”. I folded newsletters and helped with the mailings, I collated booklets, helped to host events for his

supporters and ran errands for him, to the grocery store and the post office. Zundel paid me with food and allowed me to stay at his townhouse on Carlton Street whenever things became volatile at home with my mother. I worked for Zundel on a daily basis for approx. four months, and then on an occasional, drop-in basis for the entire duration of my two years in the Heritage Front.

16. For over 30 years, Ernst Zundel was the world's most prolific printer and publisher of anti-Semitic and Holocaust-denial, revisionist propaganda. He operated his publishing imprint, Samizdat Press, out of his home at 206 Carlton Avenue in Toronto. Zundel introduced me to his good friend, British Holocaust revisionist David Irving, his lawyer Doug Christie, and taught me the false theories of Fred Leuchter which, unbeknownst to me, had already been debunked. Within a month of joining the Heritage Front and being groomed by Wolfgang Droege and Ernst Zundel, I was manipulated into hating all Jews and racial minorities, and believed that the white race was being exterminated and it was our duty to save it by fighting back against multiculturalism and diversity.
17. The Heritage Front became the family I never had. They looked after me like I was belonged to them. Thanks to them, I felt protected and that I had a place to run away to and sleep at night (either at Ernst Zundel's home or at Front member Nicola Polinuk Andrews' house) whenever the fights between my mother and I escalated and she became physically abusive. I reciprocated by doing whatever they requested of me: writing articles for their magazine, recording messages on the hotline, speaking at rallies, and speaking with the press as their only female spokesperson.
18. My role inside the Heritage Front was prominent and well-documented in their publication "Up Front", in telephone messages that I recorded on the official Heritage Front hotline, and in Heritage Front rally videotapes and assorted publicity about the Heritage Front in the mainstream press, both in print and newsreel footage. From the fall of 1991 to November 1993 I was the only public female spokesperson for the group, and was the only female to represent the Front both nationally and

internationally. Before I was recruited, the only other prominent female spokesperson was Nicola Polinuk. She been a spokesperson as the group transitioned from the Nationalist Party, but informed group leaders that she no longer wished to have a public role, at least partially due to concerns about her three children receiving negative attention.

19. Within a year of my recruitment, I was selected to represent Canada's far right on The Montel Williams Show in New York City, appearing alongside John Metzger of White Aryan Resistance – arguably the most prominent white supremacist organization in the US at the time. At the time of taping, I was still seventeen years old and a minor; as a result, Wolfgang signed my parental consent to appear on the show. My mother was not involved in this appearance and knew nothing about it. On the show, I clearly identified that I was representing the Heritage Front and repeated memorized lines and fake statistics promoting white supremacy that Wolfgang taught me prior to the taping.
20. I accompanied Wolfgang Droege to his every court appearance, and protested outside of the Don Jail when Tom and John Metzger were arrested in Toronto in 1992. My presence is documented in mainstream media newsreels, notably CBC, CTV and Global News footage. I was called the Front's "token woman" and my name and photo were printed alongside Zundel's and Droege's in posters printed by Anti-Racist Action and distributed throughout the city. I became the poster girl of the Heritage Front, often going with Wolfgang to interviews with the press, where I was marketed as the new, innocent, fresh face of the movement. Evidence of my role as the Front's only female spokesperson is attached to this affidavit at Exhibit "A".

### **My Role in the Collapse of the Heritage Front**

21. The winter of 1992 marked a significant turn in the Heritage Front's tactics. Whereas prior to this time, Wolfgang Droege and co-leader Grant Bristow had been content with the surge in supporters

and publicity for the group, and the fact that our public meetings/rallies drew up to 200 people in attendance, this was no longer enough. Grant Bristow in particular wanted the Front to take a more active role in targeting political opponents, chiefly the anti-racist activists who were protesting and actively trying to shut down the Heritage Front.

22. A key figure among the anti-racist activists trying to shut down the HF was Rodney Bobiwash, a policy analyst/director at the Native Canadian Centre on Spadina Road, who had initiated a complaint with the Human Rights Commission regarding the Heritage Front hotline, the same complaint that would lead to Judge Joyal's 1993 injunction preventing any Heritage Front members from operating a hotline. Bobiwash also began to operate a counter-hotline called "Klanbusters" operated out of the Native Centre on Spadina Road, published a newsletter, and was in alliance with Anti-Racist Action (ARA), a coalition of anti-racist activists who protested in the streets and confronted the Heritage Front at court appearances and public rallies. Such confrontations often led to violent clashes and skirmishes between the racist far-right and anti-racists that frequently made national headlines. Attached to this affidavit at Exhibit "B" is a copy of the injunction.
23. Prior to the winter of 1992, the leadership had seemed intent on marketing the group as a "white rights lobby group". In December 1992, however, Front co-founder Grant Bristow decided that we needed to create an "intelligence" unit. Bristow appointed himself the "Intelligence Chief" of this division and proceeded to instruct Front members to pursue harassment and psychological terror tactics against community activists such as Anti-Racist Action leaders Kevin Thomas and Ruth Mackenzie, and Rodney Bobiwash, who was targeted because of Klanbusters Hotline and the fact that he filed the Human Rights Commission complaint that muzzled the Heritage Front Hotline.
24. Bristow called this the "It Campaign". Attached to this affidavit at Exhibit "C" are my affidavits relating to Bristow's incitement of illegal activities and the harassment campaign. In a 1993



affidavit, I described this campaign: *“When someone was made IT, that person’s life would be made miserable. They were to be harassed 24 hours a day. Not be able to eat or sleep in peace. The goal was to make ITs life miserable, get IT fired from ITs job and made to fear one’s own shadow. The only way an individual could stop being IT was by giving up someone else’s name and phone number, so that new person was going to take IT’s place.”*

25. Bristow gave me the names, addresses and telephone numbers of several individuals previously unknown to me, who I was instructed to “check up on” and call from a payphone to harass and terrorize. In particular, he gave me the name and telephone number of a lesbian Anti-Racist Action activist named Ruth Mackenzie and instructed me to harass her and, because he needed a female voice for this disinformation campaign, to record messages on sex phonedlines pretending that I was her, where I would ask for men to come to her house to rape and beat her. I was still seventeen years old and underage when Bristow first counselled me to commit such illegal acts. I did not terrorize anyone and didn’t follow Bristow’s instructions, but I kept Ruth’s phone number. At the time, I was struggling with my sexuality and started to identify with Ruth and the women targeted by the HF. I knew I would be in danger if the group found out I was a lesbian, so I kept my sexuality a secret.
26. Bristow’s “IT Campaign” started with threatening phone calls and progressed to innocent people’s workplaces being called in an effort to get them fired from their jobs, and to their rental housing in an effort to get them evicted from their homes. Answering machines were hacked, messages intercepted and phone numbers lifted. The list of people to be terrorized was passed around by Bristow to skinheads who bragged about it afterwards. Anti-racist activists and those who left their personal information on those answering machines were stalked in person and/or harassed via telephone, either at home and/or at work. Bristow himself made many of those calls, and enjoyed calling people’s employers to ask, *“Did you know your employee is a pedophile?”*

27. Bristow instructed me and a group of skinheads that included the Fischer brothers, who were members of the Canadian Airborne Regiment and gave paramilitary training to the HF, how to:
- a) hack into anti-racist groups' answering machines, starting with Klanbusters and the Anti-Racist Action Hotline, and progress to calling people back to harass them.
  - b) Use reverse directories to track addresses. If an address was unlisted, use other deceptive ways to get it, i.e. call to pretend the target won something and offer to mail out a prize.
  - c) Impersonate reporters and call up various community organizations to conduct mock interviews for the purpose of gathering information.
  - d) Attend anti-racist rallies in disguise and wait in cars equipped with police scanners, thus intercepting any information about demonstrators that police might radio back to HQ.
  - e) Use Hydro utility directories and voters' registries openly available at the Toronto Public Library to identify all residents at a particular address.
28. In the winter of 1992/January 1993, shortly after turning eighteen years old, I grew troubled by the escalation of targeted harassment of women, particularly the newest batch of leaflets that Wolfgang had produced and given me with the instruction to distribute widely. The flyers in question were part of the Bristow disinformation campaign, and featured a racist cartoon with a young anti-racist female activist's name, home address and telephone number listed below. The flyer conveyed a racist message against black people, and implied that the woman named on it was responsible for their creation. I became concerned with the possibility that the innocent young woman targeted might experience violence or harassment as a result. Instead of passing them out as directed by Wolfgang, on the night of January 21, 1993 I give it to a couple of Anti-Racist Action activists I met

in an evening class, as a way to warn them and the intended victim, Celeste, of what was going on.

A copy of the ARA activist's 1994 affidavit is attached to this affidavit at Exhibit "D".

29. In February 1993, two police officers came to my Shuter Street apartment and questioned me about the flyer. Given the fact that I was a member of a group where members often called for the death of "traitors", I did not want to be "a rat" and refused to tell the officers where the flyers came from. As a result, I was arrested and charged with publishing defamatory libel and, months later, with hate propaganda. The charges were dismissed in 1994 after the anti-racists to whom I'd given the flyer signed affidavits stating that I handed them the flyer to warn them about the actions of the Heritage Front. Later, new information came to light about Wolfgang Droege having printed the flyers at his co-worker Al Overfield's office. For reasons unknown to me, police declined to charge Wolfgang, Overfield or Bristow (who provided the cartoon used in the flyer) with either defamatory libel or hate propaganda.
30. After my arrest, I was released on my own recognizance but given bail conditions that explicitly prevented me from associating with Heritage Front members. The group exerted pressure on me to continue my involvement with them, so I disobeyed these conditions and continued my regular and frequent association with the group, with the only marked difference being that I was no longer a speaker at the public meetings/rallies. However, I continued to assist Ernst Zundel (who was not an official member of the HF) and Wolfgang Droege with mail-outs at their homes, and I continued to work with Wolfgang behind the scenes in the recruitment of new members.
31. I continued to secretly struggle with the escalation of Heritage Front violence against political opponents, the LGBT community, the harassment of women and lesbians, while I struggled with my own hidden sexual orientation. I was also being pressured by Heritage Front members to plead guilty because I had no criminal record and would not likely serve any jail time, while Wolfgang

had a long criminal record and was very likely to receive a longer sentence than me. I refused to plead guilty because I was innocent, but continued my behind-the-scenes work. As a result of not hanging out publicly with my friends, I grew increasingly close to Grant Bristow, who kept giving me “intelligence” tasks such as looking up anti-racist activists in databases and hacking into telephone answering machines in order to provide him with information. I also attended two community group meetings in Toronto with the Irish Freedom Association, where I engaged in conversations in order to identify potential Irish Republican Army supporters, and informed Bristow of the meetings and names of people I’d encountered.

32. I felt increasingly at odds with the “intelligence” tactics I was being taught by Bristow, and his continued obsession with ARA activist Ruth Mackenzie. Even after my arrest, he continued to engage me in both breaching my bail conditions by doing work with the HF, and also involving me in occasions where he would call Ruth using a blocked number and intimidated / harassed her. The escalation toward violence and terrorism left me profoundly unsettled. My initial belief that the Heritage Front’s “intelligence” work and our members often engaging in paramilitary training was part of a defensive strategy to defend the white race from extermination, faded to give way to the realization that the group I was part of was, in fact, the aggressor.
33. I felt guilty for going along with HF co-leader Grant Bristow and listening in while he telephoned Ruth to harass and terrorize her. There was constant pressure on me from the Front to participate in illegal activities, all the while I heard about serious incidents involving the Heritage Front, such as:
  - a) The fire-bombings of the Runnymede group home, a Youthlink home for teen girls
  - b) The harassment and subsequent sexual assault of a Black Runnymede group home worker who had been responsible for the eviction of a teenage female HF member

- c) The May 1992 firebombing of the Morgentaler abortion clinic in Toronto, with the name and telephone number of the Heritage Front hotline spray-painted across the street from the clinic on the same day as the attack
- d) The firebombing of Kitchener Jewish resident Mona Zentner's home on multiple occasions, following her protest of David Irving's talk at the European Imports Store
- e) The brutal beatings of three Tamil men in the summer/fall of 1993, in three separate incidents. Two of the men were killed and one man was left paralyzed. I believe these incidents took place in close time proximity to Heritage Front rallies and a rock concert featuring RaHoWa, a band named after the acronym for "Racial Holy War". To the best of my recollection the two murders were never solved; the beating of the third South Asian man resulted in the conviction of Jason Hoolans, a card-carrying Heritage Front member. News coverage is attached to this affidavit at Exhibit "E".

34. By May-June 1993 I wanted to extricate myself from the Heritage Front, but I did not know how. For two years they had been my family, taught me everything I thought I knew about the world, and groomed me to become a mouthpiece for the organization. They had made it clear that I belonged to them and I didn't know how, or where, I could go outside of the organization. Everything I believed was now filtered through their racist doctrine and ideology, and I didn't feel that I knew who I was anymore. There was also the unfortunate reality that wherever I went, people often recognized me – I had appeared on national and international television to represent the group, and I didn't think I could start fresh without the stigma of being a neo-Nazi following me. I was also struggling with my sexual identity, and I had been told by a Heritage Front member that "the only honourable thing" for a homosexual to do if they couldn't be straight was to kill themselves.

35. In or around June 1993, I attempted suicide. After being admitted to Women's College Hospital for overdosing on the pills in my mother's cabinet, I decided to reach out to Ruth Mackenzie. Since I still had Bristow's note with her telephone number in my pocket, I called her from the hospital and she came to meet with me that night. We would have several more meetings in secret for approx. three weeks following my suicide attempt, at which time she helped to deprogram me from the propaganda I had been taught, and also helped me confront and deal with the shame and guilt I felt about my sexual orientation. In July 1993 I decided that I was ready and emotionally strong enough to leave the Heritage Front. However, because I felt so guilty about the IT Campaign against innocent people like Ruth, and because I was angry that the Heritage Front continued its escalation to violence while still grooming young people like myself into participating in potentially-illegal activities, I decided that I wanted to shut down the group.
36. I felt that my position among the core group members had enabled me to be privy to significant confidential information about illegal activities and illegal weapons. Ruth put me in touch with a Montreal-based organization that monitored and tracked far-right extremist activity, called the Canadian Centre on Racism and Prejudice. It's Executive Director, Martin Theriault, worked with me over the next four months as I spied on the Heritage Front between July 1993 and November 1993, collecting information such as details of events, weapons, and membership lists. I also provided Martin with a partial membership list of Ernst Zundel's supporters, since I was able to copy addresses while stuffing envelopes with newsletters during mail-outs. I wrote and signed approx. 30 affidavits that I, along with Martin, presented to two OPP officers during a meeting at a downtown Toronto hotel in November 1993. On that day, I was told that the OPP could not provide me with protection or admission into the Witness Protection Program, as I had requested.

37. It was during this period of active spying on the Heritage Front and gathering of information that I hoped would be used by police to bring criminal charges against the Heritage Front, that Wolfgang Droege asked me to speak with a potential new recruit. He told me it was a young woman going to Queen's University in Kingston, ON, by the name of Elizabeth Moore. He told me that he felt she would respond better to a female recruiter, given her recent article in Up Front magazine's May 1993 issue, in which she had written that she had not yet joined the Heritage Front due to concerns related to potential sexism. Neither Wolfgang nor I had ever met her at that point, and she had not attended any of our events or meetings. I assumed that, like most residents of the Toronto area and many subscribers to the Up Front magazine, she had heard about us through the press. If you owned a television set or a newspaper subscription in 1993, it would have been difficult *not* to learn about the Heritage Front; we were all over the news and mentioned in dozens of articles and newspaper editorials due to the often-violent clashes and street brawls between neo-Nazis and Anti-Racist Action activists, as well as the frequent court appearances involving Wolfgang and the Human Rights Commission case that had placed the Front and its hateful messages in the media spotlight.
38. At paragraph 26 of her affidavit, Elizabeth Moore states that "Elisa had been another prominent female member of the group but by early 1993, I understood that she was no longer actively involved. Therefore, I did not know her personally at that time." This statement is blatantly false and contradicted by evidence submitted by Elizabeth herself in her affidavit's Exhibit "A", a handwritten note from Wolfgang Droege in which he instructs Elizabeth to telephone me "if you want to meet other HF members". He told me that he had not met her in person, but he felt she would respond better to me and be more comfortable speaking with a female. A copy of this note is attached to this affidavit at Exhibit "F".

*"Elizabeth,  
Elisse Hategan, one of our members, would like to talk (sic) you. She is app. your  
age. Her phone # is 367-8417.*

***If you are interested in making contact with other HF members please give her a call.***

*Sincerely, Wolfgang.*

*P.S. If you want to (sic) more about her first, call me 691-4552*

39. Droege's note indicates that, unlike Elizabeth's claim that I was no longer actively involved in the HF, I was as active as ever. Along with Droege and Gerry Lincoln, I served as a gatekeeper who interviewed potential recruits – this is why Elizabeth was instructed to speak with me as a condition prior and precluding her meeting with other Heritage Front members. Elizabeth's note proves I was central to the recruitment process: I helped Wolfgang to assess new recruits' potential value and role in the organization. As Wolfgang's right-hand woman when it came to youth recruitment, I can say with absolute confidence that I never spoke with Elizabeth Moore prior to the end of August or early September 1993, I never met her in person during my entire time in the HF, and she was never a spokeswoman for the group. Wolfgang designated me as a gatekeeper when he requested that she should call me first. Wolfgang's note expresses that:
- a) If Elizabeth was interested in meeting other members of the Heritage Front, she was to talk to me first; and
  - b) As the time she spoke with me, Elizabeth had yet to meet other HF members.
40. Elizabeth and I spoke over the phone in approx. late August or early September 1993, and I did my best to dissuade her from joining the Front, telling her horror stories about sexism and men not treating women as equals. The reason I remember specifically that it was at the end of the summer is because I had just come back from Montreal, where I infiltrated the Hammerskins skinheads (headed by Adam, who was also featured in Hearts of Hate) at Martin Theriault's request, in order to prevent a hate rock concert from taking place. At that time I had met two young women who were breaking up with their Hammerskin boyfriends due to sexism and heavy drinking, so I shared



those stories with Elizabeth in order to scare her off the idea of joining a hate group where women are typically not treated as equals.

41. At the time of our conversation, Elizabeth was less than three months away from her twentieth birthday. During our call, she seemed receptive and happy to have the conversation. Years later, in an email dated January 17, 2013 which is attached to this affidavit at Exhibit "G", Elizabeth thanked me for having tried to warn her about the group: *"I want you to know that I never forgot the conversation we had before you defected. It wasn't until I decided to leave that I understood what you were trying to say to me. I wish I had been able to hear it at the time and save myself, but I had to walk my own path, I guess."*
42. Within days of our conversation Wolfgang phoned me, yelled at me and questioned why I had told Elizabeth negative things because she had informed him about our conversation. He told me he would have to fix the damage I caused and would follow up with her directly. As a result of me trying to dissuade Elizabeth from joining the Heritage Front, I had incurred his anger and risked blowing my cover at a time when I was actively spying on the HF and writing affidavits that I would later present to the OPP.
43. In November 1993, Wolfgang Droege telephoned me and requested that I go to his apartment at 2 North Drive in Toronto. Shortly after I arrived, a core member of the Heritage Front joined us; his name was Peter Mitrevski. Both of them started to question me about the possibility that I was an informant, due to me asking too many questions in the previous months, and the fact that one HF member's daughter had seen me jotting information down in a notebook. They demanded to see if I was wearing a recording wire, and Peter Mitrevski pulled out a knife and held it in close proximity to my neck and chest while he proceeded to lift my clothes and touch my body without permission while searching for evidence of a recording apparatus. At this time, both Wolfgang and Peter told

me that I could never leave the Heritage Front, and that nobody would want me since I had been seen on television praising Hitler. They told me that “rats end up in the sewers”, which was a direct threat on my life given that I was on the end of a knife and being questioned about being a traitor. Wolfgang also told me that “the Heritage Front will never be brought down by a girl.”

44. I was able to convince Wolfgang and Peter that I was too stupid to have been able to fool them for many months and that I didn't know anything, nor carried any recording devices. As soon as I left Wolfgang's apartment, I raced home and retrieved a duffel bag and knapsack I'd prepared for this eventuality, and called a telephone number Martin Theriault had given me in case of an emergency. That same night, I permanently left my mother's Shuter Street apartment and went into hiding.

#### **Life After the Heritage Front**

45. I would remain in hiding and not living at any fixed address for approx. a year and a half, travelling up and down the east coast of Canada, and spending significant parts of that time in Quebec and Nova Scotia. In March 1994, four months after my defection from the Heritage Front, I was called as a witness to testify against Wolfgang Droege and two other Front leaders in a Human Rights Commission tribunal where I was considered the “star witness.” My testimony and cross-examination took three days. Decades later, I would learn that Elizabeth Moore had been in attendance in the courtroom and took notes of my testimony. I did not recognize her at the time since I had never seen her during my time in the Heritage Front. Attached to this affidavit at Exhibit “H” is news coverage of my testimony and the Court's decision.
46. In June 1994, Madam Justice Danielle Tremblay-Lamer found all three Defendants – Wolfgang Droege, Gary Schipper and Kenneth Barker – guilty of contempt and sentenced them to jail terms of three months, two months and one month respectively, that would be carried out over the summer.

In her judgement, she wrote this about my testimony. A copy of my 1993 affidavit and Judgement excerpt is attached to this affidavit at Exhibit "I".

*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."*

47. On August 14, 1994, when Wolfgang Droege was approximately halfway into his three-month jail sentence, Toronto Sun reporter Bill Dunphy broke the story that Front co-founder, co-leader and "intelligence chief" of the Heritage Front Grant Bristow was actually an undercover CSIS paid informant. Following the exposé, CSIS swept in and removed Bristow from the Heritage Front, placing him into witness protection and leaving the Front without a leader. In his front-page article, Dunphy credits my affidavits and court testimony about Bristow's harassment activities and the It Campaign as a contributing factor to the closer scrutiny and investigation that led to the eventual exposure of Bristow as a mole, by stating that "allegations of Bristow's involvement in a harassment campaign first surfaced with Elisse Hategan's defection." Attached to this affidavit at Exhibit "J" is a copy of the article, police investigation re Bristow and the Fifth Estate documentary.
48. A Fifth Estate episode that aired on October 4, 1994 similarly attributes the beginning of Grant Bristow's exposure and eventual end of Operation Governor as partially stemming from the release of my affidavits. "When Elisse came out and said she was going to tell the truth, CSIS was saying they were going to get out and discredit her because at least Hategan was pointing the finger at Grant Bristow." The Fifth Estate quoted a CSIS insider source stating that the CSIS Toronto Region Investigator speaking about me had uttered the phrase: "We'll tear her to shreds".

49. My affidavits led to a discreditable conduct charge being brought against a Toronto Police Services officer who was charged with being on the membership list of the Heritage Front, buying their videotapes, and attending a KKK rally in Arkansas. My affidavits also led to the expulsion of a Heritage Front member from the ranks of the Reform Party, a conservative party where at least a dozen Front members had joined ranks after being directed to do so by Wolfgang Droege and the HF leadership, who even offered to give HF members the \$10 sign-up fee in an attempt to populate the Reform Party with white separatists in the hopes that “someday we’ll take over”. Attached to this affidavit at Exhibit “K” is a copy of my 1993 affidavit.
50. The contempt of court convictions and jail sentences of Wolfgang Droege, Gary Schipper and Ken Barker, followed in quick succession by Grant Bristow’s exposure as a CSIS informant, were a one-two punch from which the Heritage Front never recovered. By the time Wolfgang emerged from jail in the fall of 1994, people were leaving the organization in droves. The organization was nearly defunct, and by the time Wolfgang was sentenced to serve yet another prison sentence in February 1995 for assaulting an activist during a street brawl outside Sneaky Dee’s tavern on June 11, 1993, the Heritage Front and its leadership had collapsed. Despite attempts in later years by other members to revive it, the group dissolved.
51. I was the only young woman who played any role whatsoever in the collapse of the Heritage Front. My testimony led directly to the convictions and prison sentences of Wolfgang Droege and two other neo-Nazis, and my affidavits exposed the criminal activities of CSIS operative Grant Bristow, leading to his eventual removal from “service”. As I went on the run for my life, Grant Bristow received a generous compensation, relocation to Alberta, a three-car garage house, free long-distance calls and flights to visit family in Ontario, and an allowance of \$3000 per month for several years afterwards – which, in 1994, was a very generous sum. Adjusted for inflation using Bank of

Canada's Inflation Calculator, this figure is \$4788 in 2019. For his role as founder and leader of the HF, he was paid approx. \$80,000 over his 5 years of "service". No Canadian neo-Nazis and/or white supremacists were ever arrested and convicted as a result of his 5-year undercover activity. Attached to this affidavit at Exhibit "L" is an article detailing Bristow's compensation package.

52. During my years in hiding I experienced severe anxiety and distress from death threats, endangerment, fear, and extreme poverty. I questioned whether I should just turn myself into the Heritage Front because life on the run seemed, at times, worse than death. I could not form long-term relationships due to frequently moving around, and I was scared that I would endanger those closest to me. I wrestled with guilt and shame at my past. I suffered from depression and post-traumatic stress, and received absolutely no police protection, compensation, or even a change of ID following my courageous actions as an eighteen-year old teenager – actions that unlike Bristow's, had actually led to criminal convictions. As such, I feel that I have earned the right to state unequivocally that I contributed to the shutting down of the Heritage Front at great personal risk.
53. I did not receive Witness Protection, and I believe that I was only able to survive thanks to the kindness of activists who opened their doors to me and let me sleep on their couches before and after the trial – anti-racist activists, Quebec farmers, a Nova Scotian black minister, indigenous activists, college students, senior citizens, and LGBT community members. On rare occasions I earned a small income from sharing my story to high school audiences and at Toronto City Hall, and participating in media interviews, including my participation in the Hearts of Hate documentary, which earned me \$400 – attached to this affidavit at Exhibit "M" are copies of my records involving those engagements. Periodically, I had to dumpster-dive and panhandle on the street to earn enough money for food and shelter.

54. On June 13, 1995 I appeared as a voluntary witness in the Parliament of Canada, at an inquiry into SIRC's handling of the Bristow Affair organized by a subcommittee on National Security. I testified in detail about my teenage years, my recruitment and involvement in the Heritage Front, and spoke about the illegal activities I witnessed Grant Bristow commit. A written transcript of this hearing is available on the internet, and I have also attached a copy to this affidavit at Exhibit "N":
55. Even though I had dropped out of school in grade nine, I wanted to change my life for the better and to continue my education. While living in Halifax in 1994, I decided to enroll in a two-day examination for a high school equivalency diploma. I was able to pass the test on the first try and not have to return to high school studies. Subsequently, I received a grade 12 General Equivalency Diploma (GED) certificate from the Nova Scotia Board of Education.
56. My stay in Halifax was cut short when I was tracked down by individuals associated with the Heritage Front – I started receiving phone calls that threatened my life and those I lived with. Afraid that the people who had kindly opened their doors to me might be hurt because of me, I sought refuge at Adsum House, a homeless women's shelter on Brunswick Street. I lived at Adsum for approx. two months, and eventually rented a room with a lesbian couple on Artz street. A month later, I found a note stuck to the front door of that house addressed to my birth name (rather than the name I was known by at the time), which indicated that I had been tracked down again. People close to me also began receiving disturbing telephone calls. Not wanting to endanger the women I lived with, I was forced to run again and ended up in Ottawa, ON.
57. In Ottawa I was once again on the mercy of strangers, couch-surfing and living with roommates. I tried my best to change my appearance, at one point even shearing off most of my hair and dyeing it a different colour – I used different names with each move and new city. I believe that disguising my appearance and name (eventually formally changing my name and the spelling of my first

name), as well as living a considerable distance away from Toronto, was a crucial part of ensuring my safety. Another way of ensuring my survival was to keep a low-profile and not participate in any more speaking engagements for many years following my defection from the Heritage Front.

58. In 1995 I applied to Carleton University and the University of Ottawa as a mature student and I was immensely grateful to be accepted to both institutions. I chose to enroll at the University of Ottawa, drawn in part by the reputation of their criminology program. I managed to put myself through university using a combination of Canada and Ontario student loans, several merit scholarships and part-time jobs. At times I still had to resort to food banks and dumpster-diving to feed myself.
59. In 1999, I graduated *magna cum laude* with a double major in criminology and psychology. I was also a volunteer for the Elizabeth Fry Society, going into the Ottawa-Carlton Centre to work with female inmates on artistic projects. My intention was to pursue law school but realistically, by the time I wrote my LSAT exam, I didn't have the funds to make this dream possible since my student loans had gone into default and I had no financial support from family or friends.
60. Months after graduation, I was offered a position as an English teacher in Seoul, South Korea that paid better than the job I had in Ottawa at the time. I traveled to Seoul and lived there for approx. fifteen months, working as an instructor to children, youth and adult learners. My contract ended in the spring of 2001, and I spent that summer backpacking through Europe, returning to Romania for the first time as an adult. I tracked down the village where my father grew up and met relatives I hadn't seen since childhood. After speaking with them and receiving several items that had belonged to my paternal grandmother, I realized that my father's family was of Jewish ancestry. Attached to this affidavit at Exhibit "O" is evidence of my Jewish heritage and formal conversion.

61. I had already been drawn to Judaism while attending the University of Ottawa, where I had taken a year-long Creative Writing course under the tutelage of renowned Jewish poet Seymour Mayne, who spoke often about his faith and made me reflect on Judaism as a spiritual path. My realization that I actually had Jewish ancestry cemented in me a strong desire to convert to Judaism. However, because of my neo-Nazi past, I felt too ashamed to approach a rabbi about the process. It was only in 2012, after taking an ancestry DNA test through the US company 23andMe and having my Jewish ancestry confirmed, along with being connected with nearly a thousand Jewish relatives through the platform's "Relative Finder" tool, that I felt brave enough and compelled to reclaim my father's hidden heritage. I underwent the lengthy, formal process of conversion, which involved studying for a year, and officially converted to Judaism on December 17, 2013.
62. I moved back to the Toronto area in the fall of 2001 and have since worked as a writer, blogger, freelancer, ghostwriter and consultant. Since 1999, my poetry and short prose has been published in prestigious Canadian literary magazines such as *The Fiddlehead*, *Grain Magazine* and *CV2*. My articles have appeared in the *Canadian Jewish News*, *NOW Magazine*, *Global News* and *Maclean's Magazine*. In March 2014, I published a memoir of my time in the Heritage Front, titled *Race Traitor: The True Story of Canadian Intelligence Service's Greatest Cover-Up*. Prior to the release of my memoir, I had written a 2011 novel based on my life that I also called "Race Traitor" – I unpublished this book after I released my 2014 memoir, but I believe it is through this novel that Elizabeth Moore tracked me down, discovered my website and contacted me.

### **My Relationship with Elizabeth Moore**

63. Elizabeth Moore first emailed me on January 17, 2013. I had not heard from her since the day she had telephoned me, at Wolfgang Droege's request, in the latter half of 1993. I had never met her in person while I was inside the Front because she came on the scene around the time I was leaving,



and at that time she was living in Kingston, ON and attended Queens University. I knew what she looked like because we were both featured in Peter Raymont's 1994 documentary *Hearts of Hate*. I was also aware that a CBC film called *White Lies* had been released in 1998, starring Sarah Polley, supposedly based on Elizabeth's experiences. When she emailed me, after having read one of my books, I was thrilled to connect. A copy of her email is attached to this affidavit at Exhibit "P".

64. The night Elizabeth and I first met in person – on Monday, January 21, 2013, at Big Sushi restaurant in Toronto's Annex neighbourhood – Elizabeth told me that Bernie Farber had helped her to get the CBC consultant job for the film *White Lies*, which was supposedly based on her experiences in the racist movement. During dinner we talked about our lives since we exited the Heritage Front. We discussed the *White Lies* movie briefly, although I remembered very little about it. When it aired in 1998 I was living in a student rooming house and had access only to a shared television set, so I wasn't sure if I had seen the entire movie or only parts of it.
65. At paragraph 28 of her affidavit, Elizabeth asserts that she initially reached out to me because she thought that "we both had very similar experiences" inside the Heritage Front. I disagree with this claim, and do not believe that Elizabeth and I had had "very similar" experiences. I was a 16-year old minor living in Toronto when I was groomed, and subsequently exploited, by leaders of the Heritage Front who manipulated me into agreeing to be their softer, innocent, female public face. I spoke at every rally and spoke on their behalf to the media; eventually, my affidavits and testimony contributed to the collapse of the group. Elizabeth, on the other hand, was a privileged 19-year old adult university student who did not even reside in Toronto for the duration of her one-year involvement with the Heritage Front; it was my understanding, confirmed during our initial dinner meeting, that Elizabeth had simply parted ways with the HF and, with the help of Bernie Farber, went on speaking tours during the time I lived in hiding.

66. Although our first meeting was very positive and we eventually became close friends, I felt an initial sense of doubt and discomfort at the fact that much of our conversation at Big Sushi restaurant centered around Elizabeth doing her best to convince me of how similar we were. I relayed this concern in a Facebook Messenger conversation with someone I considered my best friend at the time, Kurt Phillips. For many years, Kurt had run a blogsite known as Anti-Racist Canada (ARC), and a Twitter account known as @ARCCollective, and he is widely considered an expert in Canadian far-right extremism because of his extensive work in documenting the activities and historical roots of Canadian neo-Nazis and white supremacists. His blog has been cited in numerous articles, and his work was hailed by Bernie Farber and the Anti-Hate Network as the most reliable source of information about the far-right. Having contributed articles and information to the ARC website since 2011, I wanted to tell Kurt about my meeting with Elizabeth since he was familiar with both of our names and previous involvement with the Heritage Front.
67. In my correspondence with Kurt, dated January 23, 2015, at 1:15 a.m. – approx. one day after I met Elizabeth in person for the first time – I expressed my initial concern that Elizabeth might be a copycat. Attached to this affidavit at Exhibit “Q” is a copy of this message: *“Guess who I went to dinner with last night? Elizabeth Moore, who now goes by Liz. She ran into my book on the net, sent me an email, and the rest is history as they say. [...] I’m freaking a little because it’s like she set out to copy every single thing I did, it’s just so weird.”*
68. Instead of following my instinct, I dismissed those initial concerns and engaged in a very amicable and close friendship with Elizabeth. We had several interests in common beyond the experience of having been indoctrinated into, and subsequently leaving, a far-right group. We had many conversations via email, Facebook Messenger, telephone and in person. We visited each other’s homes and our partners met as well.

69. In our frequent email and Facebook Messenger conversations, we discussed our past involvement with the Front. In a conversation dated April 7, 2014, Elizabeth confessed that unlike me, she had not been taken into the leadership's circle of confidence, nor was she entrusted with "sensitive info". Attached to this affidavit at Exhibit "R" is a copy of the message, where she stated:

***"I was in from ages 19-21, I think. I was kept pretty far from the eye of the storm, I think in part because they were still smarting from your defection and didn't want to trust another girl with sensitive info 😊"***

70. Elizabeth's 2014 admission is in marked contrast to the accounts Elizabeth has told the press in the 1990s, and the false claims she has made between 2017-2019, such as that her involvement in the Heritage Front started in 1992, when she was a high school student in Scarborough. Elizabeth could not lie to me in private correspondence about her age at recruitment because we both knew that in 1992 she had not yet joined the Heritage Front, and in fact we had not even spoken about her being a potential recruit until late August or early September 1993.

71. Throughout 1992 I was the *only* young female at the forefront of the Front, marketed as the new face of the movement, groomed as a future neo-Nazi leader by both Ernst Zundel and Wolfgang Droege, and flown to appear on The Montel Williams Show in November 1992 to represent Canada's far-right. By contrast, with the single exception of making an appearance in the documentary Hearts of Hate, which also featured me and numerous other white supremacists associated with the Heritage Front, and contributing a couple of articles to Up Front, the Heritage Front's magazine, there was no evidence and no documentation of Elizabeth's participation inside the Heritage Front, or even of whether she had been an official member.

72. In the Facebook Messenger conversation of April 7, 2014, Elizabeth told me that she had received \$12,000 from the CBC for selling her rights, via an agent, for the making of White Lies. Later, I

would see Farber's name in the film credits and realize that he too had profited from what turned out to be a conflation of Moore's and my life. At the time she relayed this information to me, I was still under the impression that *White Lies* was an accurate representation of her life. I did not recall seeing the entire film back in the 1990s, but I'd heard about it and thought that I had seen bits or pieces of it, and I remember that my impression was negative. At the time of its release in 1998, I was suffering from depression and post-traumatic stress related to my involvement in the Heritage Front. I was on antidepressant medication, trying to complete my university degree, and avoided seeing material that could trigger a negative reaction, so I may have avoided seeing *White Lies* on purpose, or stopped watching it partway. I also lived in a student rooming house in Ottawa where I did not own a television set. A copy of this message is attached to this affidavit at Exhibit "S".

73. Also in the Facebook Messenger conversation of April 7, 2014, Elizabeth wrote that after leaving the Heritage Front, she had been taken advantage of by an "*activist who was a sexual predator who took extreme advantage of me.*" Knowing that Elizabeth had volunteered with the Canadian Jewish Congress for several years after exiting the Heritage Front, I wondered if she was speaking of someone associated with the CJC, but waited to ask her in person. At no point during this Facebook conversation did Elizabeth indicate that the conversation was private, or demand my silence prior to initiating her comments about the alleged "sexual predator." Also, at no point during the conversation where the subject of a "sexual predator" was initiated by Elizabeth of her own volition, did I offer any statement agreeing to, or implying a promise of, privacy.

74. At paragraph 30 of her affidavit, Elizabeth asserts that she disclosed information about her affair "with a married man" with the expectation that I would keep it confidential. She writes "I specifically asked Elisa to keep this information confidential, and she agreed." However, as our April 7, 2014 Facebook Messenger clearly shows, at the time Elizabeth first initiated a discussion

about the “sexual predator” who allegedly “took extreme advantage” of her, there had been no such prefaced request on her part, nor any agreement on my part, about keeping any of our discussions confidential. Furthermore, it is my understanding that the tort of invasion of privacy does not exist in Ontario.

75. On Wednesday, February 11, 2015 I met Elizabeth at the Madison Pub in Toronto for lunch. The Jian Ghomeshi scandal had broken a couple of months earlier, and during lunch we started to discuss our own personal experiences involving abuse and sexual harassment. This is when I decided to continue our previous discussion about her being abused by a “sexual predator”. Elizabeth surprised me by telling me that the man she was talking about was a former director at the now-defunct Canadian Jewish Congress, Len Rudner. She told me that no one, not even her husband, knew of what had happened. I acknowledge that Elizabeth told me the information she was about to share was confidential and a secret she had kept from family and friends, but I did not consent or verbally agree to keeping it private. My answer was, “So what happened?”
76. According to Elizabeth, after she left the Heritage Front she began to volunteer at the Canadian Jewish Congress – dropping in, participating in public events, and hanging out with Bernie Farber. Soon Len Rudner came on the scene as a Director of community outreach, and together they participated in speaking engagements and projects on the topic of hate and antisemitism. Soon after they started working together, and for several years afterwards, she became involved in an abusive, sadomasochistic relationship with Rudner, who at that time was a friend and second-in-command to Bernie Farber, then-president of the CJC. Elizabeth told me that the affair started after Rudner and herself were coming back to her basement apartment after an anti-racist meeting one night. Just as he was getting ready to leave, he’d grabbed Elizabeth and kissed her. She told me that she paused for a second and then thought, “Why not?” and that is how it started.

77. According to Elizabeth, their relationship soon turned violent – she told me that Rudner put bruises on her because he wanted to see them on her the next day at the office. She told me she still was in possession of emails from Rudner discussing the bruises. She was still trying to decide what to do with that email evidence. “I’ve still got Len’s emails, in which he talks about what he did to me the night before...I’ve thought about using them,” she told me. “I can destroy him.”
78. I asked Elizabeth why she had allowed it to go on for so long since according to her, the relationship had been on and off again for several years. She replied, “I wanted to be beaten up by a Jew.” She told me that she felt so guilty about being a neo-Nazi that she wanted to be punished. Elizabeth then proceeded to tell me about a curious episode of being invited to Bernie Farber’s youngest son’s Bar Mitzvah, where she happened to be seated next to Len Rudner, whose wife of many years was seated on the opposite side. “Caught between his mistress and his wife, he looked like the cat who ate the canary,” Elizabeth said.
79. I was horrified to know that someone in a powerful position at the CJC, a man twice Moore’s age, might have taken advantage of a potentially-mentally-unstable young woman still reeling from her involvement with an extremist group. I didn’t blame Elizabeth for contemplating the idea of blackmailing Rudner or potentially holding it over his head to obtain future benefits. At the same time, I wondered if the numerous opportunities Moore had earned via the Canadian Jewish Congress came about as a result of sexual affairs or other collusion – after all, Rudner was responsible for giving her speaking gigs and casting her in a new film, a 2005 documentary titled “Choose Your Voice”.
80. I was extremely troubled by my discussion with Elizabeth at the Madison Pub. Everything that I had learned about her in the last two years told me that she had misrepresented her involvement in the Heritage Front to have been more significant than it really was. Because of this, and my concerns

over the relationship between Elizabeth and CJC directors, I felt compelled to watch *White Lies*. I googled it and discovered that it had been uploaded onto YouTube.

81. On February 16, five days after my last meeting with Moore, I watched the film for the first time in 17 years. As I watched, I became horrified by the fact that a significant proportion of scenes played by Sarah Polley (as the character “Catherine Chapman”) were in fact depictions and recreations of experiences that happened to me in the 1990s. The realization that the majority of *White Lies* represented my lived experiences and *not* Elizabeth’s, was compounded by my new understanding that Elizabeth had also gained many advantages through her connections with the Canadian Jewish Congress, and notably her affair with a Director who endorsed her narrative for many years.
82. It was at this time that I decided to confront Elizabeth about the *White Lies* appropriations. Our friendship officially ended on February 21, 2015, after I confronted her in writing about the appropriation of significant elements of my life for the production of *White Lies*, for which she earned \$12,000 and for which she was credited exclusively as the source of filmmaker Dennis Foon’s inspiration, both on Foon’s own website and in the publicity surrounding the film’s release.
83. On the night of Feb 21, 2015 Elizabeth sent me an email in which she admitted that film producer Dennis Foon had researched my life via public court records, press articles and interviews with people who knew me – but she herself denied culpability in the conflation of our stories, essentially claiming it was all Dennis Foon’s fault despite her having been hired as a consultant for the film and selling “her” story rights. A copy of this email is attached to this affidavit at Exhibit “T”.

***“What Dennis learned about you came from legit sources like court records, newspaper articles and talking to many people who knew you then. He did over a year of research on this and it certainly went far above and beyond me, my story, and what I could share.”***

84. This confirmation from Elizabeth that my suspicions were correct and White Lies was indeed inspired, at least in part, by the writer/producer researching my life for over a year while I lived in hiding, left me shocked and devastated. Coming on the heels of her admission that she had had an intimate relationship with Len Rudner while also earning projects and speaking engagements via Rudner and Farber, I believed that Elizabeth had appropriated my lived experiences and was able to market them as her own using close relationships with CJC directors.
85. Because I believed that significant elements of my teenage lived experiences had been deliberately appropriated by Elizabeth and she was able to get away with it for so many years due, at least in part, to her intimate relationship with Rudner and the continued endorsement of his friend and fellow CJC director Bernie Farber, I wanted to make this situation public and to bring it to the attention of the CBC. However, I felt that neither Elizabeth nor Len Rudner would readily admit to the affair if I confronted them with no written or recorded evidence. Therefore, I resorted to bluffing and I told her that I had taped our conversation at the Madison Pub, as a way to elicit written statements where she would admit to a potential collusion between herself and CJC director(s). At paragraph 30 of her affidavit, Elizabeth writes that I “was taping our entire conversation”. This is incorrect, and it is a fact that such a recording never happened. Even if I had recorded her, it is my understanding that one-party consent recordings are not illegal in Canada, and the tort of “invasion of privacy” does not exist in Ontario.
86. I unequivocally deny that Elizabeth Moore and I ever formed an agreement to hold any of her communications in confidence. I also deny that the circumstances whereby Elizabeth freely shared personal information with me give rise to an obligation of confidentiality. The conversation about her abuse by a “sexual predator”, who she later identified as Len Rudner, was initiated by Elizabeth without her ever making a demand for confidentiality as a prerequisite to her disclosure. Based on



the foregoing, any of Elizabeth's communications to me that were published were not unauthorized or published in an unlawful manner. I also deny that my public statements concerning Elizabeth have resulted in any injury or detriment to her, and I hold her to the strictest proof thereof.

87. Given the gravity of what I had learned, I felt distressed and compelled to discuss it with someone. Once again, I communicated with my friend Kurt Phillips, the owner of the Anti-Racist Canada blogsite. In a Facebook Messenger conversation dated February 21, 2015, which is attached to this affidavit at Exhibit "U", I wrote:

*"It's a really, really weird phenomenon to realize that someone has essentially become your doppelganger - that she has - quite literally - appropriated your experiences. She also told me (I forgot to include it in her letter) that after she got out of the HF, she thought SHE was also a lesbian....and went through a whole gay phase.*

*I mean, it's like this individual, without any personality, charisma or FIRE of her own, decided to just step into my place - at first in the HF, befriending Wolf and Gerry, who used to tell her that he missed me (lol), writing a couple of stupid shit-pieces in Up Front about what a traitor I was.....and then, when she saw the light and left the movement, while I was in hiding because of genuine danger, she was going around capitalizing and monetizing on the whole thing. [...]*

*So here I am, doing all this shit grunt work to shut down the movement, and Elizabeth is LITERALLY having old people at synagogues walk up to her and say "I saw you on tv/read about you and I know what you did - you're a brave girl." And of course she accepted the compliments and the speaking engagements while everybody bundled her life into mine - our names are very similar anyway and we're both short, dark-haired girls...it's pathetic.*

*And then, when we had lunch last week she confessed that she'd been having this horrible S&M (similar to Ghomeshi, actually) relationship with Len Rudner, married CJC (now CIJA) official at least 20 years her senior, and he used to beat her up and have extremely rough sex with her.....oh, but it went on for years. They'd break it off every time Liz got involved in another relationship, but when that broke up, back to Rudner she went. Please don't tell anyone about this, I am only sharing it because it demonstrates her head-space -- and if you don't know who Len Rudner is, google him and it'll tell you all you need to know - he was 2nd in command next to Bernie Farber back at the CJC. Apparently not even Bernie knows that this went on - and obviously Rudner took advantage of her mental instability and guilt at having been in the HF.*

*I just find it abhorrent that she has done her best to BECOME me over the years. It's freaky, there are a lot of little things that I'm not even mentioning which indicate this, and to be honest I doubt she herself realizes what happened."*

88. In the two years I had been close friends with Elizabeth, we had numerous discussions in person, over the telephone and Facebook Messenger that made me realize that her involvement with the Heritage Front was not as extensive as I had previously thought. Through our conversations, I realized that Elizabeth never experienced the majority of events depicted in *White Lies*; these events were attributed to me in newspaper articles, two documentaries, and via court records, trial and House of Commons transcript testimony. After watching *White Lies* on YouTube, I also learned that Bernie Farber had also profited from the production – his name is mentioned in the film credits.
89. I was shocked that two prominent directors of the Canadian Jewish Congress would readily endorse Moore and attribute to her what I perceived to be a serious conflation and fraudulent appropriation of significant elements of my story. In all the films, press coverage and speaking gigs she was given between 1995-2005 and then again in 2017-2019, it appears that Elizabeth’s version of what she claims she experienced in the Heritage Front was never questioned. In fact, Bernie Farber repeatedly endorsed her story and promoted her further via engagements that – at least on some occasions – earned her paid honorariums and further exposure. Attached to this affidavit at Exhibit “V” are copies of these engagements and endorsements.
90. I was devastated by the knowledge that Elizabeth’s consensual affair and relationship with Rudner while he was employed as a director of the Canadian Jewish Congress had occurred during the same time she received many additional speaking engagements, community appearances, and the opportunity to participate in a second film titled “Choose Your Voice” (2005), a project that I believe was funded by public money, where Len Rudner is listed as a “Co-creator” and part of the “Project Development” team.
91. I believe that it is impossible to separate or entirely ignore the fact that Elizabeth was having an affair with the Director of the CJC responsible for community projects and outreach at the same

time as she was being handed out paid opportunities such as speaking engagements and a second film role (the first film, *White Lies*, also being secured through Elizabeth's connections with Bernie Farber and the CJC), and not question the procurement process, much less when it comes to the fact that my lived experiences were already appropriated in *White Lies*.

92. We live in a modern, 21st century society where anybody has the fundamental right to have intimate relationships with whoever they please. However, if such an affair leads to one individual being given publicly-funded projects, opportunities and engagements to the exclusion of others, I believe it is a matter that cannot be ignored or swept under the carpet under the auspices of "invasion of privacy" – particularly as Elizabeth's potentially-appropriative narrative in projects was, and continues to be, marketed to schoolchildren across Canada. According to a 2009 Toronto.com article publicizing the campaign, "Choose Your Voice was introduced in 2005 [...] Three and a half years later, the program has spread nation-wide to 140 school boards, 5,000 schools and 500,000 students". According to Rabble.ca, the Choose Your Voice program was spearheaded by a coalition of "business leaders and prominent individuals" called Fighting Anti-Semitism Together (FAST):

*"FAST supporters include a who's who of the corporate elite: President TD Bank, Ed Clark; CEO of CN, Hunter Harrison; CEO of Manulife Financial, Dominic D'Allessandro; CEO of Bombardier, Laurent Beaudoin; president of Power Corporation, André Desmarais; President of RBC Financial, Gordon M. Nixon and many others." Other persons who have participated and/or endorsed the Choose Your Voice program are Ben Mulrone and Kathleen Wynne."*

93. Given the enormous amount of money and public donations that have gone into a program such as this, and when it has been introduced into 140+ school boards and openly taught to half a million schoolchildren, I believe that it is particularly important to examine if patronage or an intimate affair between the Director of the program and Elizabeth Moore affected the (possible lack of a) transparent selection process. Attached to this affidavit at Exhibit "W" is a link to the CYV film and articles describing the campaign.

94. Elizabeth may prefer for me and the Court to believe that her lengthy affair with Rudner had absolutely nothing to do with Rudner including her in the Choose Your Voice campaign and other paid Canadian Jewish Congress initiatives, but I find it implausible. I don't know if it is possible to separate their personal relationship from their public work together, particularly as the latter indisputably led to Elizabeth gaining greater credibility and monetizing opportunities in the community, for a narrative that I believe appropriates significant elements of my life and identity. I believe it is impossible to extricate Elizabeth and Rudner's day-to-day projects from their after-hours personal relationship and the possibility that projects were given to her, at least in part, due to their intimate affair. Moreover, due to the fact that, according to Elizabeth, the affair consisted of consensual violence and sadomasochistic beatings, it is conceivable that Rudner may have given Elizabeth opportunities because he felt remorseful or indebted for putting bruises on her.
95. On February 23, 2015, I published a blog post on my Incognito Press blog, titled "*White Lies: A Pack of Lies, or How the CBC Ripped Off My Story*". The piece brought together all the claims I could find at the time (including statements made by Dennis Foon on his website) stating that Elizabeth was the sole inspiration for *White Lies* – a film about a "high school girl" (which Moore was not at the time of joining the Heritage Front). Despite Elizabeth's claim in her February 21<sup>st</sup>, 2015 email that the film was a fictionalized rendition of many sources of inspiration, her actions – both in the articles that accompanied the film's release, and in statements she would go on to make to the press in 2017-2019 – show that she represents it as exclusively her own story. The UK-distribution VHS and DVD covers of *White Lies* also state the film is "Based on a True Story."
96. Elizabeth's husband Soren is a professor who teaches law and public policy courses at York University. On February 23, 2015, within hours of my article going live, my partner received a text message from Soren stating they planned to pursue defamatory action against me if it was not taken

down immediately. I made no attempt to remove it. At paragraph 33 and Exhibit F of her affidavit, Elizabeth falsely claims that my blog post is defamatory. I believe that not only is the entirety of my blog post accurate and factual, but that Elizabeth's claim is statute-barred pursuant to Limitations Act, 2002, and her claim for damages should have been commenced prior to February 2017.

Attached to this affidavit at Exhibit "X" is a copy of Soren Frederiksen's message.

97. The following week I visited Bernie Farber at his downtown office – at that time he was working with billionaire Michael Dan's Gemini Power company, which sought to build power plants on Indigenous reserves. I informed him of what I perceived as collusion between Elizabeth and Rudner, and asked why I had not been credited for White Lies. Bernie told me that everybody in the film was a composite – the journalist was a mash-up of himself and Bill Dunphy, and "Catherine Chapman" was a blend of me and Moore. "What do you want?" he asked me. "It happened many years ago."
98. I told Bernie that everybody was credited and had profited except for me, and the film wouldn't exist without me since most of the scenes where action happens were based on my experiences. Specifically, the scenes where "Catherine" becomes the face of the organization, represents and writes articles for them, goes to a KKK rally, attends weapons and firing range, is privy to fire-bombings, physical violence, and the stealing of the membership list, was all me. I felt that I had been exploited and Elizabeth had publicly claimed that the film represented only herself. However, at that point I didn't want money – I just wanted a single line of credit. Naïvely, I didn't think it would be a problem, given the fact that my life had inspired the majority of the film.
99. Bernie promised he would get producer Dennis Foon, who is a Facebook friend of his, to add my name to his website since Foon only credits Elizabeth Moore as the inspiration for White Lies. "No problem, I'll get Dennis on the phone," he said. However, nothing changed after my meeting with

Farber. Worse yet, in 2017 Elizabeth and Bernie resumed their alliance and both falsely claimed that Elizabeth had been “the face” and leading spokesperson for the Heritage Front, adding a new lie to the narrative: the false claim that she – along with me – contributed to the collapse of the group.

100. In December 2015 I initiated a Twitter DM correspondence with Len Rudner about his affair with Elizabeth. Rudner insisted that we meet face-to-face but I declined, and on December 11, 2015 he gave me his personal email *kromyoulent@gmail.com* so that we could correspond further. In an email dated December 12, 2015, Rudner admitted to the affair with Elizabeth Moore but claimed that the reason he had not looked to hire anyone else for the “Choose Your Voice” project was “because, honestly, she was the only ex-Nazi whose phone number I had.” A copy of my correspondence with Len Rudner is attached to this affidavit at Exhibit “Y”.
101. I believe that Rudner hired Elizabeth for the project and had her telephone number because they were already engaged in an intimate relationship. I do not believe that he did any due diligence in looking for any other narratives from former extremists such as myself. Rudner also did not specify whether his possession of Moore’s phone number came as a result of their intimate relationship or through her volunteering with the CJC. I believe that his decision to simply call Elizabeth rather than follow a formal/transparent procurement process came as a result of their preexisting relationship, which was of a sexual nature.
102. In an email dated January 3, 2016, Len Rudner writes: *“Elisa, while you may not be using my name, it is not going to be very hard for people to connect the dots. The effect on my wife, my marriage and my family will be devastating. Please, Elisa ... I cannot tell you how to feel, but I ask you to reread our earlier exchange of emails. I was not part of what happened during the creation of White Lies (and its aftermath). I accepted the narrative as true because I was unaware of any alternative. Please Elisa ... I implore you.”*

### **Elizabeth Moore's Appropriation of my Likeness and Personality in White Lies**

103. In 1995, Elizabeth Moore and Bernie Farber were interviewed for a Macleans cover article titled "The Enemy Within, which was published on May 8, 1995. In the article, Elizabeth appropriates my lived experiences by claiming she experienced endangerment following her "defection" from the Heritage Front and called herself "a marked woman". Elizabeth also appropriates my youth and minor age by misrepresenting herself as a "high school student" at the time of her recruitment into the HF, when in fact she was an adult. Thirdly, Elizabeth appropriates my lived experience as a Front spokesperson, which she was not: *"she rose to become one of its chief spokespersons."* This article, which features a prominently-placed photo of Elizabeth, caught the eye of CBC movie producer Phil Savath and screenwriter Dennis Foon, who soon approached Moore and Farber and initiated discussions that would culminate in the making and release of *White Lies*, 3 years later.
104. The CBC movie *White Lies*, released in 1998 and starring Sarah Polley as the fictionalized character "Catherine Chapman", uses significant aspects of my experiences as reported in 1991-1995 press, documentary media, my court testimony against Heritage Front members, affidavits, and testimony in the House of Commons. Despite the clear reliance of the story upon my experiences and role in bringing down the HF, Elizabeth Moore continues to publicly represent that the story of the protagonist in "*White Lies*" is based on her own unique experience, which is false.
105. Producer and screenwriter Dennis Foon is interviewed in the DVD's 'Bonus Feature' section, where he speaks about how excited he was by the prospect of making a film about a "normal", "educated", regular, "middle-class" white girl from the suburbs, with "nothing particularly deviant or crazy about her" (i.e. not abused, poor, gay or particularly vulnerable, as I was) who attended university being caught up in the white supremacist movement. Both in the Bonus feature and on his website,

Foon continues to credit Elizabeth Moore as the sole inspiration for the film. Attached to this affidavit at Exhibit “Z” is a copy of the film White Lies and Bonus Feature.

106. For a long time I was upset with the producers who participated in what I view as a blatant exploitation of my life – the life of a girl who did something brave, but had no prospects, protection or legal representatives to ensure that my life would not be cannibalized, dissected and used in a film to profit others, while I was actually suffering in poverty and hunger. It was only in 2017, as I was digging into Elizabeth’s inconsistent narrative, that I realized her attempt to deflect all blame onto Foon had been a lie. I now believe, and have incontrovertible proof that I will present throughout this affidavit, that Elizabeth’s appropriations started 3 years before the film’s release. This discovery suggests that from the start, Elizabeth provided the filmmakers with an appropriative, fraudulent depiction of her life inside the Heritage Front that was not an accurate representation of her lived experiences but rather a conflation of my unique story with her own.
107. The majority of scenes are derived or based directly from my lived experiences as a teenage girl who rose up the ranks of a white supremacist organization, turned against them, spied on its leader, and defected. Attached to this affidavit at Exhibit “AA” is a copy of the evidence that White Lies is based on my experiences. More specifically:
- a) The opening scene is based on a 1993 incident at Riverdale Collegiate which generated tremendous publicity in Toronto at the time. The high school auditorium was filled with mostly youth attending an anti-racist event where Martin Theriault, the man who eventually helped me defect from the group, was the headlining speaker. Howard Gotlib, the former (now retired) principal of Riverdale Collegiate who is a congregant at Temple Kol Ami, attended my recent talk at Kol Ami and told me he remembered that I was present during the meeting. Janice Dembo, a former employee with the Toronto Mayor’s Committee on



Race Relations, also remembers me walking up to the microphone to ask Theriault a question.

- b) Scene where teenage girl “Catherine” submits an essay to her teacher and is given a failing mark is taken from an incident I was questioned about in my 1994 trial cross-examination, where I spoke of an essay about Anne Frank that I submitted for my ninth-grade class at Jarvis Collegiate Institute, which had upset my teacher.
- c) The scene where teenager “Catherine” sends an essay titled “Christmas is Dead” to the neo-Nazi group “NIM” (a composite amalgamation of the Heritage Front and Ernst Zundel) is taken directly from the essay I wrote for Up Front magazine’s inaugural December 1991 issue. I was sixteen when I wrote it, and it was called “A Politically-Correct Santa?”
- d) Scene where teenage girl “Catherine” is introduced to the Mrs. K, NIM’s German-born leader who is modeled after Ernst Zundel and played by Lynn Redgrave. “Catherine” quickly becomes Mrs. K’s protégé and begins to work at her house, recording videos and eventually becoming the fresh, young face of the group.
- e) Teenage “Catherine” quickly rises up the ranks and becomes an official spokesperson.
- f) She records messages for the official group and distributes flyers – I am the only woman who ever recorded messages on the “official” Heritage Front hotline. Elizabeth never did; all the messages she wrote and recorded were on a separate, proxy hotline called the “Euro-Canadian Freedom Front”, but not on the official Heritage Front line. By the time Elizabeth became active in the HF, the only “voice” of the official hotline was Gary Schipper.

- g) “Catherine” attends rock concerts and rallies – this is based on my experiences in the HF, particularly the Roma Restaurant concert on November 13, 1992 where the band RaHoWa played. I was videotaped giving a speech that night right before the concert started.
- h) “Catherine” gives speeches and is filmed for publicity campaigns. Later, as “the new public face” of NIM, she goes on a “TV interview”. This mirrors identically my experience as the new, softer face of the HF, my Michigan trip where I met US white supremacist leaders Dennis Mahon, Tom and John Metzger, and subsequently went on Montel Williams alongside John Metzger.
- i) “Catherine” attends KKK rallies – I attended 3 such rallies between 1992-1993 – two in London, ON area and one in Michigan, USA, at the memorial of Pastor Bob Miles, which is closest to the experience depicted in *White Lies*. At the Michigan compound, I witnessed white supremacists selling guns illegally, firing them, and one of the Heritage Front men I drove with smuggled an illegal gun back into Canada.
- j) “Catherine” is given training in firing weapons – at age 17 I was trained to fire shotguns, and used a .22-calibre rifle I received from Drew Maynard (mentioned in a 1993 affidavit) – a similar, if not identical, rifle to the one Sarah Polley fires in the movie. Moreover, I actually owned a registered Firearms Acquisition Certificate (FAC) which I was forced to relinquish as a bail condition after my 1993 arrest on charges that were dismissed in 1994.
- k) The TV interview where “Catherine” discusses the issue of repatriating immigrants back to their homelands, is reenacted nearly verbatim from a conversation I had with Montel Williams on his show in November 1992. I was taught to memorize scripted lines by Front leader Wolfgang Droege before going on the show, and before I gave other interviews with

the press. While under the careful watch of NIM's male leader (a fictitious character based on Wolfgang), Catherine mentions "Louis Farrakhan" in her answer to justify racial separation, parroting my answer to Montel Williams's question. She also wears a grey suit jacket and white shirt, the exact outfit & hairstyle I wore on the Montel show.

- l) "Catherine" visits a member of NIM in prison; I believe this scene is inspired by my conversations with Zvonimir Lelas, who went to prison for a year for spray-painting synagogues and then tried to tell me how the movement had betrayed him.
- m) "Catherine" witnesses and takes part in a beating, and her group is involved in fire-bombings – while I did not witness any beatings or the fire-bombings of Mona Zentner's home in Kitchener, I was quoted in articles and on CTV National News in relation to my belief that the Heritage Front was responsible, and this is part of my 1994 trial testimony.
- n) Teen girl infiltrates left-wing organizations: in my House of Commons testimony on June 13, 1995, I testify about Bristow pushing me to spy on left-wing organizations.
 

*"I was directed by Grant Bristow to obtain information on legitimate organizations in Toronto such as the Irish Freedom Association, North American black nationalist groups and others. Bristow told me he wanted to build a file on these groups." [...] "He also knew that I was a supporter of the Irish nationalist movement and that I had gone to a meeting of this organization called the Irish Freedom Association. He was very curious about that, so I provided him with written documentation of names, addresses and things I had researched. He wanted me to continue that as well. It was just intelligence-gathering."*
- o) Teenage girl is horrified at the escalation of violence against innocent people and decides to approach anti-racist activist for help. – This is based on my experiences as detailed in my 1993 affidavits involving the It Campaign, which was started by Grant Bristow, and also repeated in my 1994 trial testimony, 1994 Vision TV documentary and 1995 House of Commons testimony:
 

*"Starting in the winter of 1992, I first became aware of a massive terror campaign on our group's part, targeting anti-racist groups and individuals. It was launched by the head of the Heritage Front intelligence, Grant Bristow. Front members and supporters were approached and encouraged to go after designated targets. I was one of those approached by Grant Bristow. In the first weeks of January 1993 several individuals would get phone*

*calls day and night from supporters or members of the Front in order to make their life miserable and create a climate of tension and fear. Such a climate was used to stir up a potential confrontation with members of anti-racist groups.” [...]*

*Grant Bristow was the coach and the designer of the campaign, which lasted until my public defection to the Canadian Centre on Racism and Prejudice in November of that same year. On several occasions I personally witnessed his role in providing personal information on “enemies of freedom”, as he used to refer to anti-racists and members of Jewish organizations, to members of the Heritage Front.”*

- p) A conversation between the male NIM leader and “Catherine” in a diner, where he hints that NIM had something to do with recent terror attacks – this reflects my conversation with Wolfgang Droege that made me believe they were behind the recent fire-bombings in Toronto and Kitchener, and is part of my 1993 affidavits.
- q) Teenager “Catherine” works with anti-racist activists and “proves herself” by turning over membership list she downloads from Mrs. K’s computer – I stole a partial membership list while stuffing envelopes at Ernst Zundel’s house and turned it over to Martin Theriault.
- r) Teenage girl defects – I was 18 when I defected; Elizabeth left uneventfully at age 21.

108. Despite the fact that my life inspired a substantial portion of the film, from 1998 and into 2019 Elizabeth has perpetuated the false impression that the “Catherine Chapman” character was based solely on her experiences throughout the media blitz that accompanied the film’s release, most notably captured in a 1998 Globe and Mail interview that features side-by-side photos of Polley and Moore, with the caption “*Polley (left) plays a young neo-Nazi in a **movie based on the real-life experiences of Elizabeth Moore** (right).*” *In the film, a character based on Moore is played by 19-year old actress Sarah Polley.*” The article also quotes Elizabeth as saying the film “accurately” represents her real-life experiences, which is categorically false. “*Although the film is nominally fiction, **Moore has found it an unnervingly accurate portrayal of her experience. “I’ve watched the film now about six times and I’ve never gotten through it without crying,**” she said.*”

Attached to this affidavit at Exhibit “BB” are articles where Moore is represented as the sole inspiration of White Lies.

### **The Impugned Domains and Social Media Marketing Expertise**

109. Several months passed after I ended my friendship with Elizabeth, and I continued to feel frustrated and betrayed at both her and Bernie Farber's lack of acknowledgement of my critical role in the creation of White Lies. I started to wonder if Elizabeth had sought me out and wormed her way into my private life in order to find out more about me and my experiences in the Heritage Front, and I feared that she might potentially appropriate my experiences in the future. Thus, in mid-2015, I lawfully registered several domains that were available for purchase – including thelizbuzz.com, which is similar to Elizabeth's then-Twitter handle "@thelizbuzz", hoping that it would reduce the likelihood that she might reproduce her appropriations in a website format.
110. At paragraph 79 of her affidavit, Elizabeth claims that the act of me blogging on the subject of marketing and branding is an "appropriation of her personality" because that I had "previously shown no interest in social media marketing". Aside from the fact that millions of people across the world who blog about marketing and branding are not all conspiring to appropriate Elizabeth Moore's personality, her claim is false and deceptive. Throughout our two-year friendship, Elizabeth was aware of the marketing efforts I put into marketing my books and poetry based on comments I made on Facebook, Twitter and my blogs. I have been an active blogger who marketed myself and my blogs since 2007. In fact, my very first blog post, dated April 7, 2007, was a post on the subject of marketing and branding, titled "Video Podcast becomes 6-figure Book Deal". I wrote more blog posts that mentioned marketing, distribution and social media marketing for bloggers/writers on April 23, 2007, August 7, 2007, June 16, 2010, July 13, 2010; Sept. 25, 2011; Nov 8, 2011. Copies of these entries are attached to this affidavit at Exhibit "CC".

111. In 2012, I published a book titled *Alice in Writerland: A Writer's Adventures in the Ugly World of Publishing*, which detailed my experiences with the publishing world and marketing my books – this evidence is attached to this affidavit at Exhibit “DD”. This book is available for sale on Amazon and Kobo and listed on my website, and I advertised it across my social media platforms. Going by the relentless frequency of Elizabeth’s visits to my website since 2015, she is very aware of its existence. Several chapters of my book deal directly with advising writers and artists about self-promotion, selling and marketing their products. My first book was self-published in 2011 and since then I have worked on promoting both my books and those of other authors.
112. Unlike Elizabeth, I had a website since at least 2007 (first indexed by Wayback Machine in 2008) and actively marketed myself as an author, as well as ran marketing campaigns for my friends. My Twitter account was created in August 2009 and my Facebook Author Page in October 2009. *Alice in Writerland* is a 381-page memoir/manual on how to make it as a writer and market through self-promotion, social marketing and industry knowledge; I had a media kit since at least 2010, and spent thousands in advertising through Facebook and Twitter ad campaigns before Elizabeth ever earned her social media marketing degree and called herself a social media marketing consultant.
113. On or around the evening of May 22, 2013, Elizabeth and I met for dinner at a pub in the Yonge-Eglinton area (around the corner from Elizabeth’s old apartment). Elizabeth had just told me on Facebook Messenger that she too was interested in converting to Judaism, and at that time I was studying for my Conversion to Judaism program. We met to discuss this common interest and she gave me a DVD with a copy of a film she had made for her Ryerson MFA program, called “In God’s Keeping.” During our conversation, Elizabeth told me that she was taking night classes at George Brown College toward a social media marketing degree. As someone who had spent considerable time and effort in marketing both myself and others, I gave her advice on how to build

a social media marketing consulting business and encouraged her to start branding herself and actively soliciting clients rather than wait, as she planned to do, until she completed her degree. My partner, who owns her own company and has taught university-level business courses for over a decade, was present at this meeting and also gave Elizabeth business advice.

114. Also at paragraph 79, Elizabeth claims that social media marketing was, at the time, her “only source of income.” I believe that in 2015 Elizabeth was unemployed and had no active clients – in a Facebook conversation dated January 16 2015, Elizabeth indicates that she had no clients: “It’s been a nutty week because I lost my only paying client. 😊” Given Elizabeth’s unemployment, me registering domains that were freely available for purchase and which she could have purchased at any time prior to me registering them, would not have harmed her lack of clientele. I believe Elizabeth’s sudden allegation that I am “appropriating” her “likeness and personality” comes as a direct result of me filing a civil lawsuit against her for appropriation of *my* likeness and personality. Attached to this affidavit at Exhibit “EE” is a copy of Elizabeth’s message.
115. At paragraphs 78 – 85, Elizabeth claims that my purchase of domains she feels she is entitled to and believes belong to her, despite her never registering or copyrighting them, is an act of appropriation of her likeness and personality. I deny this allegation, and also deny that I registered the Impugned Domains for a commercial purpose, and/or that I have gained commercially from their registration. Since Elizabeth had no clients and no active business, I could not have materially benefitted from purchasing a domain that she feels belongs to her. Furthermore, Elizabeth has not suffered damages as a result of my lawful domain registration, and I hold her to the strict proof of damages.
116. Elizabeth is not entitled to any damages pursuant to the Copyright Act R.S.C., 1985, c. C-42. Internet domains do not constitute a work in which copyright protection subsists as set out in section 5(1) of the Act. In addition to not being entitled to damages set out in the Act, Elizabeth has

suffered no damage as a result of my registration of these domains. As she asserts at paragraph 82 of her affidavit, Elizabeth had previously used “thelizbuzz” only as a handle on Twitter, Wordpress and Instagram. On Twitter she tweeted sporadically from the domain @thelizbuzz. On WordPress, she had written approx. 10-12 entries across 2 years, and did not seem to have any blog subscribers or active audience. Her Instagram account only had a few posts, and from what I recall, few followers. At the time I purchased the domain “thelizbuzz”, I did not believe (and still do not) that it had any value as a commercial brand.

117. I deny that I ever appropriated Elizabeth’s personality by referencing her legal name and/or aliases. I also deny that the use of the Twitter Handle “@thelizbuzz – a handle that she relinquished of her own volition, and was therefore made freely available by Twitter for registration – gives rise to an action, or a compensable injury. Finally, Elizabeth has suffered no injury directly or indirectly connected to the Twitter Handle that she herself relinquished, and I hold her to strict proof thereof.
118. Buying a publicly-available, unregistered domain is not illegal - it is standard business practice; it is also common for business competitors to buy domains that are unregistered. These domains were clearly not a priority to Elizabeth until I bought them. She had not registered “thelizbuzz” as a business in the province of Ontario, and to the best of my knowledge was unemployed and had no paid clients. As of August 2015 Elizabeth didn’t seem to be actively looking for work and was actively focused on conceiving a baby. She also had not registered any of the impugned domains.
119. At paragraphs 80-88, and specifically 87 and 88, Elizabeth asserts that “it would be significantly easier” if she could promote herself using her full name as a website domain, and complains that because I registered her name domains, she is forced to use the phrase “one moore liz”. However, despite her newfound desire to do business under her real name and her claim that my purchase of these domains interferes with her business, I never saw Elizabeth use either her maiden or married



name as a brand prior to 2018. In fact, as of mid-2015 she was not carrying out any legitimate business under her real name, but was tweeting and intermittently blogging under the moniker “thelizbuzz”. To my knowledge, she had previously never registered any of the domains I lawfully purchased.

120. Elizabeth falsely claims that my registration of the freely-available domains represents tortious interference with her economic relations that has “damaged” her reputation. Reality, however, is different than Elizabeth would like the Court to believe. Throughout my two-year friendship with Elizabeth I don’t recall her ever being employed, either on a full or part-time basis, and put her on strict proof thereof. I do remember her mentioning on Facebook about a short volunteer stint with a non-profit called Students Offering Support, and creating a social media page for one local business. But as her Facebook Messenger conversation dated January 16, 2015 indicates, she had no clients: “It’s been a nutty week because I lost my only paying client. ☹️” I do not recall her making any efforts to promote herself or the “thelizbuzz” brand, or to seek employment.

### **Elizabeth Moore’s Intimidation Tactics, Abuse of Power and Police Involvement**

121. On January 2, 2016 I sent a text message to Elizabeth informing her that I planned to write an article that would reveal what I considered to be a grave collusion between herself and CJC officials to endorse her, and explained that I believed airing the truth was in the public interest, particularly for the Jewish community that may have been deceived. In the text message, I bluffed about revealing excerpts of the non-existent recording I had supposedly made at Madison Pub, and offered her the opportunity to make any comments by January 11, at which time I would proceed with the exposé.
122. On January 7, 2016 Toronto Police Services officer Craig McFarquhar telephoned me to discuss two allegations by Elizabeth Moore. He told me “this is not the first time Moore has come to speak

with me – she has come to see me on several occasions in the last few months” to complain about me, most notably of the fact that I had bought “her” domains and stole her “brand” and “intellectual property”. He informed me that Elizabeth claimed I had caused her significant financial losses because I “stole her intellectual property” and “business” – her Twitter handle @thelizbuzz – when I registered the domains thelizbuzz.com and thelizbuzz.ca. He also stated that Elizabeth claimed that I had sexually harassed her because I called her a “whore” in a private email, and that she claimed I was harassing her because I had sent her a total of 9 emails/texts over the course of the previous year. McFarquhar himself acknowledged my behaviour was not illegal but threatened to charge me with “sexual harassment” if I ever called Elizabeth a “whore” again. He also demanded that I should not release the tape that Elizabeth told him I had recorded or write about it, or it would lead to criminal charges brought against me.

123. I advised Sgt. McFarquhar that I had lawfully purchased the “thelizbuzz” domain and my doing so was not a criminal activity in the Criminal Code. I also informed him that Moore’s husband had threatened me with litigation, and that I believed Elizabeth was trying to get the police involved in order to intimidate me, rather than go to the expense of suing me in Civil Court for defamation over fair comment, factual statements. McFarquhar agreed that he too believed this was a matter for Civil Court but advised me not to email or text Elizabeth again, and I agreed. During this phone call, I expressed my frustration at what seemed like an aggressive action on Elizabeth’s part to intimidate me by using police and the criminal justice system simply for lawfully buying several internet domains that to my knowledge had never been registered before.
124. Sgt. McFarquhar’s telephone call left me shaken and severely distressed. I saw it as an overt abuse of police time and resources on Elizabeth Moore’s part, and a clear attempt to intimidate and harass me using police as proxy, at least in part because I bought a domain similar to her Twitter handle.

At paragraph 86 of her affidavit, Elizabeth boasts about inciting police to threaten me with arrest because I bought “her” domains: “[*police*] warned about her behaviour regarding *thelizbuzz handle*”. This is repeated at paragraph 45 of her affidavit: “*She was also warned about her aggressive behaviour regarding her appropriation of my online handle @thelizbuzz*”, where Elizabeth admits she tried to have me arrested because she believes that me buying an unregistered internet domain that sounds like her Twitter handle is an act of “aggression” and “appropriation”. I believe that Elizabeth’s malicious actions reflect a gross abuse of policing resources and demonstrate that Moore is not shy about using deception, abuse of power and intimidation tactics to get what she wants.

125. My questionable choice of language to describe Elizabeth as a “whore” in a private email addressed to her does not offset the abuse of authority that took place when Elizabeth contacted police because she felt offended that I referred to her as a “whore” and was afraid that I would air the contents of a non-existent audio tape in which she described her S&M affair with Rudner in detail. It does not excuse the fact that a Toronto Police Services officer contacted me as an attempt to prevent the publication of an article depicting Elizabeth’s appropriations and collusion with Bernie Farber and Len Rudner. Nor does it excuse the fact that she used police and police resources to threaten me for buying domains that were not copyrighted and that, at the time of purchase, were unregistered and freely-available for anyone - herself included - to buy.
126. I believe that Elizabeth repeatedly engaged police as a strategic effort to intimidate me and prevent me from speaking publicly about her predatory appropriation of my life, and her collusion with the men who endorsed and enabled her to get away with it. I believe she did so with the full knowledge that it would cause me panic and psychological harm. During the course of our two-year friendship, Elizabeth learned the following facts about me and was aware that I would be intimidated by police:

- a) As a child, my father and I were questioned and followed by the Securitate, Romania's communist secret police, for 2 years following my mother's defection
- b) At age 14, I experienced a traumatic questioning when forced to recount parental abuse as part of a police report taken while in the care of Children's Aid Society
- c) At age 18, I filed an affidavit against a Toronto Police Services officer who was a member of the Heritage Front and had attended a KKK rally in Arkansas. As a result, I was left with a persistent fear of retribution from the TPS
- d) At age 18, I was arrested over Heritage Front flyers produced by the group leaders. Although my charges were dropped in 1994, I have no criminal record and have never been questioned by police since then, the experience of being innocent and arrested for something I did not do was traumatic and left an indelible mark on me
- e) In my whole life, I have never been questioned for any harassment or violent activity whatsoever; in fact, it was the harassment and violence within the Heritage Front that provoked my defection and subsequent testimony against its leaders.
- f) I have been diagnosed with chronic depression and attempted suicide in years prior.

127. Hours after Sgt. McFarquhar's telephone call, I was admitted to hospital and hospitalized overnight due to a suicide attempt. I felt extremely distressed and overwhelmed by the belief that I could not speak or write about having my teenage experiences stolen and monetized by Moore, or I would be arrested. This suicide attempt was a direct result of Elizabeth's attempt to use police to silence me from publishing and communicating how my own life had been appropriated for Moore's profit, as well as her intentional attempt to force me to "give back" internet domains that she herself had never registered before I lawfully acquired them.

128. After I left the hospital, I ran a \$10 business name check on Ontario.ca to see if Elizabeth had ever registered “The Liz Buzz” as a business name – of course, she had not. She had never marketed that as a business except for using the phrase as a Twitter handle, and having a Wordpress blog with 10-12 entries in 3 years and no subscribers. To ensure that Sgt. McFarquhar couldn’t arrest me for “stealing” Elizabeth’s “business”, I spent \$50 and registered TheLizBuzz as a business in Ontario. Attached to this affidavit at Exhibit “FF” are copies of my Ontario.ca name search and registration.
129. Elizabeth’s IP was all over my website and blog on the day I was released from hospital. I was later told by Tracie Sands, a former friend of Elizabeth’s, that Elizabeth was aware of the suicide attempt. The fact that Elizabeth discussed my suicide attempt with a friend and may have made disparaging remarks about me, leads me to believe that she had deliberately sought out to provoke such an attempt, and had the intent to inflict emotional distress and psychological harm. A copy of my correspondence with Tracie Sands is attached to this affidavit at Exhibit “GG”.
130. At paragraphs 89 and 90, Elizabeth implies that I am capable of violence and that my allegedly “defamatory” words are an attempt on my part to incite violence against her. This statement is malicious and indefensible, and I categorically deny that I have ever said or done anything that could be remotely construed as inciting any kind of violence against her.
131. At paragraph 62 and 63, Elizabeth seeks to obfuscate my tweets with neo-Nazis, and to create false equivalencies between me and neo-Nazis/far-right individuals who I am not connected with, I don’t follow on any social media platform, and whom I have openly condemned – who may have read, liked or retweeted any of my tweets. Elizabeth admits that no violence or any threats have been aimed at her as a result of my tweets, or retweets by social media users. She also does not claim to have suffered any financial repercussions as a result of Faith Goldy or her associates tweeting about my lawsuit, which is a matter of public record. Her baseless attempt to suggest any form of

equivalency between me and neo-Nazis in her affidavit, or to imply that my words might lead to violence against her, is part of a pattern of malicious and injurious falsehoods that have caused me lost opportunities and injured my reputation among my friends, colleagues and the community, and ultimately led me to commence litigation against her.

132. By contrast, Elizabeth Moore's own article about me in Up Front magazine issue August 1994, titled "*The End of the Road for The Elisse*", represents an effort to incite contempt and hate toward me after my testimony in the Human Rights Commission trial against the Heritage Front, and is directly aimed to a white supremacist crowd whose members had already threatened me with death. I believe that Elizabeth's repeated attempts to involve Toronto Police in policing my comments and purchase of unregistered domains, along with the deceitful statements she makes in her sworn affidavit by insinuating – without any proof – that she fears violence from me, represent a pattern of methodical attempts to make herself out to be the "good girl", irreproachable injured party, rather than the party who did the injuring. Attached to this affidavit at Exhibit "HH" is copy of the article.
133. Although I have never committed or been questioned in relation to any violence, Elizabeth is trying to portray me in her affidavit as someone prone to violence by: 1) attempting to associate me with white supremacists who may have retweeted one of my tweets, and 2) by painting me with the same brush she paints neo-Nazis and the Heritage Front – a group that, unlike her, I actively contributed to shutting down. I believe this is an attempt by her to deflect attention from the veracity of my comments. As anyone familiar with social media knows, platforms like Twitter and Facebook are public forums frequented by a wide array of persons with frequently-opposing beliefs and political affiliations. I am not responsible for the morals, character and ideology of people who may read my content. In all my years on social media, I have strived to post only truthful and verifiable content, which includes the statements Elizabeth believes are "defamatory."

134. In January 2017 I filed a police report with York Regional Police after I experienced a vicious tweet campaign directed at me that included threats from accounts similar to those following Faith Goldy. To suggest that I am aligned with these individuals in any way whatsoever simply because they may have retweeted my tweets is insane. It is possible that individuals with a strong dislike of Farber or Moore might see my lawsuit as an opportunity to poke at their opponents, but this is not indicative of “defamation” on my part. I am not responsible for those who agree or disagree with me; their opinions belong to them. To say otherwise is a straw man fallacy argument and a heavy-handed attempt to intimidate me from pursuing a civil lawsuit and from speaking out publicly about it by portraying my lawsuit against two Anti-Hate Network members as a dalliance with far-right figures.
135. I believe that such a false portrayal of me underscores and legitimizes my claim for injurious falsehood. Elizabeth’s repeated attempts to paint me as a person who might escalate to violence – when I have never made any threats against her and I have no history of violence whatsoever, nor have I ever been questioned or arrested for any violent offence – is part of Elizabeth’s malicious attempt to defame me and injure my reputation in the eyes of the public and my colleagues. If she is willing to do this in a sworn affidavit, with no evidence whatsoever to back up her baseless claims, then I question what she has said in private to my colleagues, criminology professors, journalists and other members of the community. By insinuating that I might become a violent person, she is defaming me in an effort to stop me from speaking the truth about her fraudulent appropriations.
136. In 2015 I initially purchased and registered the impugned domains in order to protect my brand from any potential future appropriations by Elizabeth. My fears were confirmed in 2018 when Elizabeth proceeded to register and create a website titled onemooreliz.com, where indeed she has appropriated elements of my lived experiences to create a false and fraudulent narrative that she is currently using to market herself as a consultant and “educator”. As of today’s date and even after

commencing litigation against me for “defamation” and claiming that my lawful purchase of unregistered domains consists of an appropriation of her name, Elizabeth *has never actually asked me* for those domains, which she claims are rightfully hers despite her never having registered them. Although I was willing to consider transferring them had she made the request, she chose instead to involve police and urged them to threaten me with arrest. As a result of this and her persistent appropriations of my life, I am no longer willing to relinquish them.

137. In the spring of 2017, and again in the summer of 2018, I communicated with a Detective from the Ontario Provincial Police about my concerns regarding Elizabeth Moore’s fraudulent appropriation of my life. Although the officer was sympathetic, he believed that what Elizabeth was doing would not be considered identity fraud in the criminal code because she was not actually using my name while appropriating significant elements of my lived experiences and claiming them as her own. As a result of my communications with this OPP officer, and following several instances in 2017 and 2018 where Elizabeth publicly misrepresented my experiences as uniquely her own, I realized that I had no choice but to commence Civil litigation against her.
138. After my 2016 suicide attempt, I decided that my options were limited in terms of pursuing legal action against Elizabeth primarily because of the Limitations Act and the fact that 18 years had passed since *White Lies* had been released. I decided to shift my focus to my writing and freelancing career and began to submit articles for publication to newspapers and magazines, as well as respond to editorial requests for op-eds and contribute information for investigative pieces. The primary focus of my articles involved a discussion of the far-right, extremism, and perspectives I had gleaned as a former member of a radical group, which I felt were necessary in a time of rising extremism. The following list is a partial record of my more recent articles, interviews and projects:



- a) Global News. "The Rise of White Supremacy and its New Face in the 21st Century." May 30, 2019. Produced by GlobalTV.
- b) GlobalTV Youtube channel. "How to Spot a Neo-Nazi and Other Lessons from a Former white Supremacist." May 30, 2019.
- c) CityNews Toronto. "Former Neo-Nazi Speaks Out Against White Supremacy". April 8, 2019.
- d) Shmilowitz, Tzipi. "נאצים שהיינו זוכרים אנהנו - We Remember That We Were Nazis." Yediot Ahronot, Israel's largest daily newspaper, special Shabbat supplement edition commemorating Holocaust Remembrance Day. January 24, 2019.
- e) Vescera, Zak. "A Splintered Movement: How the Far-Right Found a Foothold on Campus." The Ubyyssey, April 20, 2019
- f) Rogers Media. The Big Story Podcast. "Can You Deprogram a Racist?" November 16, 2018.
- g) CPRLV, ISDGlobal. Comic Book Publication "Radicalshow 3: They are Among Us." November 13, 2018. My story is fictionalized in the main character Jessica.
- h) CHQR 770 Global News Radio, Interview on The Danielle Smith Show. November 6, 2018.
- i) Hategan, Elisa. "Commentary: Online Hate Motivates Violence." Global News, GlobalNews.ca. Nov. 3, 2018
- j) Hategan, Elisa. "Online Hate is an Infectious Virus - and it should be addressed like real-life violence." Macleans Magazine, Nov. 1, 2018.
- k) Joseph, Simone. "Jewish Writer Speaks in Thornhill about Former Ties to White Supremacist Group: Elisa Hategan Spoke about the Heritage Front at Thornhill Synagogue." October 2018
- l) Milton, Jon. "Police, Spies and White Supremacy: A Brief History." Ricochet Media, July 2018.
- m) Holt, Jared, Far Right Watch. "Episode 20: From Facebook with Love," Sh!tpost Podcast, July 17, 2018.

- n) Prestwich, Emma. "'How Do I Tell a Rabbi that I was a Nazi?' Gay Jewish Writer Talks about her Conversion and Neo-Nazi Past." Huffington Post Canada, June 2018
- o) Chebbab, Alia. "From Hatred to Redemption", Nadja Magazine, Rethink the News. Dubai, U.A.E, May 2018
- p) Canadaland, "Canadian History X", Canadaland Commons, April 9, 2018.
- q) Univision, "Exploran Ideas que Ayuden Concientizar a la Comunidad sobre los Grupos Supremacistas Blancos". Houston TX, March 29, 2018
- r) Hayden, Michael Edison, "Neo-Nazi Charged with Domestic Violence Highlights Mistreatment of Women in the Alt-Right." Newsweek Magazine. March 15, 2018.
- s) Hayden, Michael Edison, "Neo-Nazi Website Daily Stormer is 'Designed to Target Children' as Young as 11 for Radicalization, Editor Claims." Newsweek Magazine, January 16, 2018.
- t) Bell, Stewart. "Canada's Racist Movement: A History of Violence." Global News, August 2017.
- u) CTV News Staff, "Canadian Former White Supremacist Shares Story." CTVNews.ca, Monday August 21, 2017.
- v) CTV News, "Former White Supremacist Speaks About Radicalization". Your Morning Show, CTV Network, August 21, 2017.
- w) CFRA 580 Ottawa, "The Evan Solomon Show" August 23, 2017.
- x) CJAD 800 Montreal, SiriusXM (August 20, 2017).
- y) CKNW AM980 Vancouver. "Former White Supremacist Speaks Out Against Hate". The John McComb Show, August 18, 2017.
- z) CBC News - Interview with Dwight Drummond, August 16, 2017.
- aa) Frazer, Laura. "A Former White Supremacist Explains How Radicals Recruit and Who They Target." CBC News, August 17, 2017.
- bb) CBC Radio Here and Now - Interview with Karen Gordon, August 16, 2017

- cc) Hategan, Elisa. "Turned". *Lez Spread the Word Magazine (LSTW)*, Issue 2, December 2017.
- dd) Hategan, Elisa. "Ernst Zundel: A Life on the Altar of Hate." *NOW Magazine*, August 12, 2017.
- ee) Hategan, Elisa. "White Supremacy Sexualized: The Young, Female Faces of Hate." *Canadian Jews News*, August 15, 2017.
- ff) Hategan, Elisa. "The Toronto Public Library's Tolerance of Intolerance". *Canadian Jewish News*, July 14, 2017.
- gg) Hategan, Elisa. "Lessons on Hate from a White Supremacist-Turned-Jew" *Canadian Jewish News*, June 20, 2017.
- hh) Brean, Joseph. "How Neo-Nazis are Using Attractive Young Women to Boost Their Movement." *National Post*, December 22, 2016.
- ii) Hategan, Elisa. "Confessions of a Teenage Neo-Nazi: How I Became a Heritage Front Poster Girl." *Canadian Jewish News*, July 21, 2016.
- jj) Mendleson, Rachel. "Former white supremacist probes the personal roots of hatred." *Toronto Star*, May 5, 2015.

### **Elizabeth Moore's Relentless Cyber-Stalking**

139. Since February 2015, I blocked Elizabeth on every social media platform where she had an account, and tried to ignore her despite evidence that her IP was frequently visiting my website and blog site. At paragraph 94 of her affidavit, Elizabeth admits that she does "track" my publicly available posts, but argues that she does so because she is "concerned about what new statements" I will make about her, and claims that she wants "to be aware of them so that I can be prepared to respond to Elisa's allegations." Elizabeth started engaging in what I consider cyber-stalking since the day I posted my February 2015 blog post "White Lies: How the CBC Stole My Life Story".

140. Since creating my blog and website, I have used the free, web-based app Statcounter to monitor the IP addresses of visitors to my sites; as a result of this tracking service, I was able to track frequent and relentless visits from an IP I identified as belonging to Elizabeth. Although I did not pay for the upgraded Statcounter paid service, I took screenshots on the days when Elizabeth's frequency on my site, sometimes multiple times daily, seemed to reach fever-pitch. Based on her repeated, excessive and relentless visits, even during long stretches of time and months on end when I made no comments or wrote anything about White Lies or her, I grew concerned over what I perceived as obsessive behaviour that could extend into real-life stalking or a threat of physical confrontation. A copy of this activity is attached to this Affidavit at Exhibit "II".
141. On August 4, 2015, following months of relentless crawling from Elizabeth's IP, I was compelled to write a blog post titled "An Open Letter to My Stalker." In this post, I expressed my sentiment that Elizabeth's continuous cyber-stalking had affected my health, stress levels, and left me disturbed and fearing for my safety. I advised her that if this stalking continued, I would be forced to go to police and seek a restraining order. I believe that Elizabeth's decision to go to police and subsequently to complain about me "stealing" "her" domains, was at least in part a result of her trying to beat me to the punch – that is, to get to the police first and start establishing a track record of her being stalked and a "victim", rather than herself being an active cyber-stalker.
142. Following my August 4, 2015 post, Elizabeth began to refer to me online as "her" stalker, while actively enlisting at least one friend of hers to access my private posts on Facebook. I discovered this in July 2016, after I was befriended by a woman named Tracie Sands who added me as a Twitter and Facebook friend and complimented my memoir, saying she had read it. After engaging me in conversation, she confessed that she and Elizabeth had been classmates in a social media marketing program at George Brown College, and over the previous year they had engaged in

frequent discussions about me, including discussing my January 2016 suicide attempt. Tracie informed me that after she told Elizabeth that she was following me on Twitter and Facebook, Elizabeth had urged her to “find out things” about me and to convey my private posts to her.

143. Increasingly disturbed at Elizabeth’s preoccupation with me, I tried to “shake her off” by making social media posts that brought attention to her cyber-stalking. I openly called her a stalker, knowing that she would read it, as a way to publicly telegraph the message that she should leave me alone – stop watching me, stop monitoring every single thing I do, every single day, for years. I did not know how else to stop her from making me feel constantly watched and on edge. I hoped she would be embarrassed and stop her behaviour, but I was wrong. On March 12, 31, 2016 and then again November 10, 2016 I publicly tweeted to Cogeco’s official Twitter account, also sharing a screenshot of Elizabeth’s IP. On March 31<sup>st</sup> I wrote: *“My #stalker in action: 16 visits in 9 days, not including those from same VPN location. Need 2 contact @cogeco again.”*
144. I do not believe that Elizabeth ever stopped or even slowed down what she calls her “tracking” behaviour. My attempts to shake her off have clearly failed, because Elizabeth continues not just to obsessively track my blog, website and all social media platforms, but as of this date she has followed most of the criminology professors I’m connected with on social media platforms, and even friends, work colleagues and associates from my synagogue and the Against Violent Extremism network, where I have worked a paid consultant. Worse yet, since I publicly shared the screenshot that captures the frequency of her IP hits on my websites, I believe that Elizabeth is now using Tor or similar IP-hiding software to mask the frequency of her obsessive visits.
145. It’s extremely difficult to describe the state of constant panic, dread and stress I have experienced since 2015 – seeing evidence of Elizabeth’s IP on my website and my blog, at times on a daily basis, sometimes close to 10 visits a day. On a conscious level, I realize that no human being can

watch me at all times of day and night, but this does not change my sensation of being on high-alert and under threat on a daily basis. Elizabeth's behaviour, which I believe is obsessive and disturbed, has led me to modify my own behaviour as a response. Her behaviour triggered in me a "new norm" of repeatedly checking my Stacounter IP and not being able to publicly share events and other positive news with my friends and social media contacts because of the fear and anxiety I have experienced since the onset of Elizabeth's cyber-stalking in 2015.

146. Every time I saw that Elizabeth's IP had visited my blog or website, I experienced psychological distress, dread, fear and apprehension, and was reminded of how Elizabeth had exploited and monetized a significant number of my lived experiences during one of the most traumatic periods of my life. As I relived my life, reenacted in *White Lies* without my consent and attributed to Elizabeth, and witnessed Elizabeth's repeated false claims that the film represented her experience exclusively, my post-traumatic stress was retriggered. This, in turn, led me to check Elizabeth's Twitter and Facebook page for any activity of possible further appropriations and exploitations of my story. This back-and-forth cycle, which has caused me enormous stress and I do not believe is healthy for either of us, was precipitated by Elizabeth's frequent and unrelenting cyber-stalking.
147. In January 2017 I won a \$12,000 Canada Arts Council grant to write a new memoir about my troubled family and their Jewish roots in Romania. I posted my happy news on my social media platforms, namely Facebook and Twitter. Within days and during that same week, Elizabeth created a new social media account on Twitter under the handle @onemooreliz, calling herself an "Artist". By summer, she had adjusted her Twitter bio line to sound almost exactly like my own Twitter bio description. Attached to this affidavit at Exhibit "JJ" is a copy of Moore's copycat activity.
148. Within days, Elizabeth followed nearly all my activist and journalist press contacts on Twitter and even some friends – including a Toronto filmmaker named Sylvia Nowak, to whom she later

misrepresented herself by falsely claiming she had “worked” for Ernst Zundel. I believe this was an overt attempt on Elizabeth’s part to once again appropriate and monetize elements of my life by actively seeking attention from journalists and filmmakers. In a Facebook DM conversation on April 2, 2014 I had asked her for advice in resuming anti-racism work, and Elizabeth replied that she was not, “*unless there’s something in it for me.*” I believe that her jealousy of me winning a grant and being invited to speak for Jewish organizations, later coupled with the prospect of financial remuneration in the post-Charlottesville media frenzy, instigated this activity. Attached to this affidavit at Exhibit “KK” is a copy of Elizabeth’s messages.

149. Following my 2016 articles in the Canadian Jewish Congress, and as word of mouth spread about my memoir *Race Traitor*, I started receiving invitations to appear as a speaker in Toronto’s Jewish community. On March 9, 2017 I headlined a fundraising speaking event organized by a Jewish women’s organization, Hadassah-WIZO, that raised approx. \$5000 for a hospital initiative in Israel that would benefit both Israeli and Palestinian women and children. It was a wonderful opportunity for me to share my story and experiences and connect with my community, and I shared photos of the event on my Facebook and Twitter page.
150. On March 10, 2017, the morning after my Haddassah-WIZO talk, Elizabeth posted the following comment on her newly-created @Onemooreliz Facebook page: “*Its always so cute when my harasser/stalker/copycat gets excited about accomplishing something I did years prior. 😊*” Elizabeth’s comment indicated to me that not only was she incessantly monitoring and tracking all my social media posts, but that she was exhibiting jealousy and delusional behaviour. I had started speaking engagements in the anti-racist community in 1994, soon after leaving the Heritage Front. Those engagements were sporadic at best since I lived in hiding, but I had participated in speaking engagements and panel discussions from 1994 onwards, whenever I could. Elizabeth, on the other

hand, was still associated with the Heritage Front in 1994 and started her speaking engagement career with Bernie Farber's help in 1995. The fact that Elizabeth believed she had done it *before* me, led me to believe that she was delusional. A copy is attached to this Affidavit at Exhibit "LL".

151. It is common knowledge that I am a member of City Shul synagogue. I have been a regular congregant since June 2017, and joined the City Shul Facebook group in July 2017. My Facebook page has "liked" the City Shul page, and this connection is shown in the right-hand column on my page, which I know that Elizabeth tracks on a regular basis, and she herself has admitted at paragraph 94 of her affidavit. I have also tweeted about attending my synagogue, and wrote about it in my November 3, 2018 Global News op-ed.
152. On March 22, 2019, Elizabeth attended a City Shul event and videotaped it, then posted it on her Facebook page and tweeted about it. Fortunately I was not in attendance that day, but when I saw the video of the event posted on Moore's Facebook page I contacted my rabbi immediately and shared my fears. I believe this represents an escalation in Elizabeth's behaviour, from relentless cyber-stalking into stalking me at my own synagogue. I believe it is an attempt on her part to intimidate me and make me feel watched at my own synagogue. A copy of these posts is attached to this Affidavit at Exhibit "MM".
153. This is not the first time Elizabeth has attempted to interact with my City Shul friends and congregants. In 2018 she also added my friend and fellow congregant Nick Gunz as a Twitter connection; while he did not reciprocate and informs me that he does not know her, Elizabeth continues to follow his account, as well as the account of my friend and fellow Sisterhood of Salaam-Shalom member Devon Spier, and attempts to interact with both through Liking their posts. Elizabeth has also followed the Twitter account @CityShul of my synagogue, despite her not being a congregant there. As a result of Elizabeth's actions, the decision was made by City Shul rabbi



Elyse Goldstein and manager Rivka Campbell to close off the City Shul Facebook page and make it available to City Shul congregants only. Screenshots of Elizabeth's activity are attached to this Affidavit at Exhibit "NN".

154. I believe Elizabeth's decision to post photos and recorded film footage of my rabbi Elyse Goldstein on both Elizabeth's own Facebook and Twitter pages is yet another in a long line of attempts to falsely convey the image of herself as a Jewish person. I also believe that posting photographic and film footage of my synagogue rabbi and congregants, along with the caption "*Standing with Rabbi Elyse Goldstein*" represents Elizabeth's attempt to appropriate my status as a member of City Shul and publicly disseminate the impression that she too is affiliated with City Shul.
155. Starting in 2015, I have experienced tremendous stress both from the knowledge that Elizabeth is watching me continuously, and from her relentless attempts to reach out and connect with my social media contacts, real-life acquaintances, and even my synagogue friends. But when Elizabeth decided to attend an event organized by my synagogue and videotaped it, she crossed the line from being a stalker online to potentially becoming a stalker in real-life. This resulted in me experiencing persistent stress and anxiety whenever I attend my own synagogue, and I am always nervous entering and leaving the building.

**Elizabeth Moore's Renewed Appropriation of my Likeness and Personality**

156. On August 12, 2017 the Unite the Right rally in Charlottesville, Virginia happened, marking what I believe is a fundamental change in how the media and public viewed the issue of white supremacy and the "alt-right". Almost overnight, news outlets started taking racist extremism seriously, whereas before Charlottesville the threat of white supremacy and domestic terrorism appeared to be secondary to the perception that militant Islam was the biggest threat to western countries. As a

result of this new scrutiny, people who were already active subject matter experts or had extensive knowledge about white supremacy were sought out for interviews and comments to the press and community. Unbeknownst to me at the time, Charlottesville would trigger a new wave of appropriations from Elizabeth that would culminate in me commencing legal action against her in December 2018.

### **Elizabeth Moore’s Appropriation of my Likeness and Personality in the Ottawa Citizen**

157. On August 18, 2017, Elizabeth Moore was featured on the front page of the Ottawa Citizen, a newspaper with a distribution of hundreds of thousands of readers. She was interviewed for a feature, longform article entitled “I know how powerful hate is' — A one-time Canadian neo-Nazi speaks out on Charlottesville”. In the interview and published article, Moore made several statements to the Ottawa Citizen that fraudulently misrepresented my lived experiences as her own.
158. Elizabeth falsely portrayed herself as having been “the pretty, public face of Canada's neo-Nazi Heritage Front”. This statement is false and an appropriation of my lived experiences between 1991-1993. It is also an appropriation of my life as described in the following articles:
1. "Hotlines to Homelands: A Trip Through the Far Right." The Globe and Mail, February 8, 1993. “She has already undergone careful preparation for a prominent role in the Front’s quest for a softer image”.
  2. “Former white supremacist probes the personal roots of hatred.” Toronto Star, May 5, 2015. *“Hategan is recruited by the Heritage Front, a white supremacist group based in Toronto. She is groomed to be the young, female voice of the movement.” [...]*  
*“Hategan was front-and-centre. “She was presented as the future of the movement,”*

*said Dunphy, who covered the Front for the Toronto Sun and now works for the Hamilton Spectator. “She was an angry speaker . . . She projected power.”*

3. My 2014 memoir *Race Traitor*, which Elizabeth had read, complimented and referred to in multiple conversations. On page 41 I wrote this line about Wolfgang Droege: *“He wanted to use me as **the face of a new, softer and more appealing Heritage Front.**”*

159. Elizabeth falsely claims that she was a high school student when she “fell under the spell” of the Heritage Front. In fact, she never met with any HF members or joined the organization until months after she had graduated from high school. Her claim that she was a teenage high school student when she became involved with the Front is an appropriation of my younger age and experiences.

160. Elizabeth falsely claims that she was “the only white kid” in her class at Albert Campbell Collegiate Institute, the Scarborough high school she graduated from prior to her involvement with the Heritage Front. At no time in the 20 years prior to this interview did Elizabeth publicly make the statement that she was “the only white kid” or “the only white girl” in her class. Only in 2017 did Elizabeth start to incorporate this new appropriation of my lived experience into her narrative – first to the Ottawa Citizen, then on the Roy Green Show on August 20, 2017, on The Social on January 12, 2019, and at a YRDSB public event on April 8, 2019. This new lie is a verbatim appropriation of statements I made consistently since 1994, as documented in:

- a) A 1994 Vision TV documentary about me, made for the 6<sup>th</sup> season of “It’s About Time”, which Elizabeth admitted in 1990s interviews that she had watched. At the 2:42-2:50 minute mark, I say: *“When I was 14, I was in that group home and I was...at certain periods of time, **I was the only white kid there.**”*

- b) My 1994 sworn testimony at a trial against Heritage Front leaders: *“I was only 14. I was...at certain times **I was the only white kid** in that group home.”*
- c) A sentence on page 25 of my 2014 memoir Race Traitor: *“For a good portion of the year and a half I spent at Browning, **I had been the only white girl** there.”*
- d) A Toronto Star article published on May 5, 2015 titled “Former white supremacist probes the personal roots of hatred” – *“After running away from her violent mother, Hategan landed in a group home. **‘I was the only white girl there.** I was teased because I didn’t fit in,” said Hategan, who dropped out of school in Grade 9.”*
- e) Prior to 2017 Elizabeth had stated that she was part of a white minority at her high school, claiming in the CAERS Tape that “only 20% of the student body was white”, but never said she was “the only white kid” or “the only white girl”. Her sudden shift to claiming that she was the only white student in her class contradicts evidence from demographical data, statements made by other Caucasian students I communicated with who graduated from the same cohort, and information on Classmates.com.

Attached to this affidavit at Exhibit “OO” are copies of the above-listed evidence.

161. Elizabeth falsely claims that she was one of “only two young women” in the group, and that the Heritage Front “pushed her to be its spokeswoman”. This is a lie, and an appropriation of my lived experience. Heritage Front rally videotapes and mainstream news footage from the 1990s show quite a few other females who were part of the group, but there was only one who was a public spokeswoman – and that individual was me. In contrast, Elizabeth was a fringe member who did not

reside in Toronto for the length of her active involvement with the group, and had not represented them as a spokeswoman in any official capacity.

162. Elizabeth's false claim of endangerment, expressed through the statement "They do not look kindly on those who leave the movement." In fact, she experienced no negative backlash from the Heritage Front after she exited the group, largely due to her fringe status and the fact that at the time she parted ways with the HF she was not known to most members or ARA activists. Her claim or insinuation of endangerment, both in this and other interviews from 1995-2019 is an appropriation of the real danger I experienced after my defection from the Heritage Front.
163. Elizabeth's false claim that "her experience was portrayed in White Lies, a 1998 fictionalized TV drama about a young girl who joins a neo-Nazi group." In fact, the majority of White Lies consists of my lived experiences, and in a 2015 email Elizabeth admits to me that writer and producer Dennis Foon had researched my life "for over a year" before the film was made. A frame-by-frame analysis of White Lies shows that the majority of the film consists of my lived experiences, and not Elizabeth's.
164. Other deceptive statements in the article include:
  - 1) Elizabeth's false claim that Charlottesville inspired her to resume her anti-racist activism. In fact, Elizabeth started new Twitter and Facebook accounts in January 2017 – three days after I announced my Canada Arts Council grant win, and several months before Charlottesville. As soon as she started her new accounts, she followed most of my journalist and criminology contacts, while using a Twitter bio nearly identical to mine, in an attempt to get publicity for herself and her deceptive narrative.

- 2) Elizabeth's false claim that she is married to a lawyer. In the two years we were friends, I had met her husband and learned that he is a professor at York University who teaches courses related to public policy, but is not a lawyer. My search for his name in the Law Society of Ontario did not turn up any records that indicate he is, or ever was, a lawyer.

165. In August 2017, Elizabeth had no website or blog under her maiden name; up until January 2017 all her social media platforms were registered under "Liz Frederiksen". With the exception of the @onemooreliz Twitter account she started in January 2017 and which only had approx. 300 followers, there was nearly no "digital footprint" where a reporter could locate someone who had no speaking engagements since 2003. I believe she was referred to the Citizen reporter Blair Crawford, either directly or indirectly, by Bernie Farber. If Farber is indeed responsible for connecting Elizabeth to the Ottawa Citizen, with full knowledge of my evidence-backed assertions regarding Elizabeth's previous exploitation and monetization of my lived experiences in White Lies, I believe that he shares the blame for the fraudulent appropriations that ensued as a result of his negligence. I believe that the Defendant's Motion to dismiss my case is a preemptive effort to avoid disclosing evidence through the Discovery process, and to circumvent me subpoenaing Crawford as a witness.

**Bernie Farber and Elizabeth Moore's Appropriation of my Likeness and Personality on The Agenda with Steve Paikin**

166. In September 2017, Bernie Farber tweeted that he and Elizabeth were taped for an upcoming episode of The Agenda with Steve Paikin. I was immediately concerned about potential appropriations and reached out to Steve Paikin and The Agenda team – even soliciting the help of my former attorney, Paul Copeland, who tried unsuccessfully to reach Paikin before the show aired.

167. Paikin's team at The Agenda ignored my offer to present them with evidence of Elizabeth's previous appropriations of my lived experiences, and the show aired on September 11, 2017. The Agenda's lack of interest and disregard for investigating evidence that Elizabeth's narrative might be corrupt due to the fact she had previously appropriated elements of my life and misrepresented them as hers, made me feel that nobody cared about the truth. At paragraph 68 of her affidavit, Elizabeth describes my email to The Agenda as an attempt to "discredit" her, and complains that it "added an unexpected layer of stress and work to clear up the confusion she created". I do not believe that my attempt to give The Agenda team factual evidence regarding Elizabeth's previous appropriations of my lived experiences (which they refused to look at) constitutes me "creating confusion", but a desperate attempt to prevent my lived experiences from being fraudulently misrepresented as Elizabeth Moore's – something that did occur during the broadcast and is a significant factor in my decision to proceed with litigation against both Farber and Moore.
168. The fact that Bernie Farber and Steve Paikin are Facebook friends underscored my belief that my story was being deliberately suppressed and appropriated by Farber and Moore through Farber's extensive network of journalistic contacts. I believed that Farber might lie for Elizabeth to cover up his own material gains from White Lies, as well as cover for previous endorsements where he had attributed the film to her. Starting in 1995, Farber and Moore have benefitted financially and enjoyed media exposure from what I regard as a dog-and-pony show where Bernie plays the benevolent and wise director who rescues the naïve girl-next-door from bad people and shows her the light of her hateful ways via a visit to the Holocaust museum.
169. On The Agenda with Steve Paikin, Farber and Elizabeth deliberately conspired to conflate my story with Elizabeth's. Farber lied for Elizabeth by stating that she was "the face" of an organization she had barely been a member of. Farber also used plural terminology when he claimed that "it was the

women who brought down the Heritage Front”, when in fact Elizabeth had absolutely nothing to do with it. At no point in time did Elizabeth step in and correct these false and appropriative statements made by Farber.

170. Since 1995, during a time when I was living in hiding and feared for my life, Elizabeth and Farber cashed in on numerous speaking engagements, film and media coverage. The sensationalist story of how important Elizabeth had been, and the significance of Farber’s role in her “defection”, grew accordingly. But on the night of September 11, 2017, a new false claim was born on The Agenda: that Elizabeth Moore had “brought down” and “shut down the Heritage Front”.
171. I believe that Bernie Farber’s untruthful statements on The Agenda were made with negligence and utter disregard for truth, and form an injurious falsehood that has harmed me and my brand, my career and future opportunities, as well as led to further wrongful appropriations of my lived experiences that continue to this day.
172. Bernie Farber clearly lied on The Agenda when he deceitfully misrepresented how he and Elizabeth met and connected. He describes an event where he spoke at Queen’s University, where Elizabeth was in the audience. According to Farber – the very next day, Elizabeth had called him at his office to thank him for not exposing her as “the face” of the Heritage Front. He states: “*She reached out to me I think the next day at my office and called me and said...and thanked me for not exposing her, so to speak, and basically said, I’d like to meet. And I said Sure. You know, I was not going to say No. I think...you know, I heard in her voice kind of a bit of a plaintive plea.*” This is false for the following reasons:
- a) This event took place either in the spring or summer of 1994 and prior to August; it was described in the Heritage Front’s UP FRONT magazine August 1994 issue, on page 13. On



page 14, Elizabeth's article "*The End of the Road for The Elisse*" was published, which is full of hate and vitriol toward me, showing she was an unrepentant racist at the time.

- b) Elizabeth went on to be filmed in the Hearts of Hate documentary several months after this talk; by then, she had moved up to second-year university and was filmed distributing racist literature on campus and operating her independent racist hotline. At no point did she give any indication that she was thinking of leaving the Front, much less that she had met with Bernie Farber, as he falsely claimed, in the previous months.
- c) Elizabeth's own Affidavit contradicts Farber's deceptive version of events – at paragraph 10 of her affidavit, she writes that she first spoke with and connected with Farber after Thanksgiving 1994, which fell on October 10, 1994, through a third party: "***After attending that [Thanksgiving 1994] party, I reached out to Eric Geringas, the Associate Producer of Hearts of Hate, and asked him to help me get in touch with Bernie Farber, who, at the time, worked for the Canadian Jewish Congress. I knew who Mr. Farber was because in the previous school year (1993-94), I attended his presentation at Queen's University where I was a student.***"
- d) Despite knowing that Farber's version of events did not match her reality, Elizabeth made no attempt to correct him at any point during the show.

173. Bernie Farber commits the tort of appropriation when he deliberately and without my permission used my name and courageous actions as an 18-year old teenager and conflated them with Elizabeth Moore, who was a privileged, upper-middle class adult woman who did nothing to shut down the HF: "*By the way, [Elizabeth] was one of a couple of women that were involved in the Heritage Front, both of them actually, Elizabeth and another woman by the name of Elisa Hategan. Both of*

*them ended up being heroes in terms of how they were able to take themselves out, how they were able to work with the system, to basically **shut down the Heritage Front**. And so in this particular case, it's kind of interesting that **the women were the heroes in shutting this down**.”*

Attached to this affidavit at Exhibit “PP” is a copy of The Agenda episode and transcript, and the Up Front article describing Farber’s talk at Queen’s University where Elizabeth was in the audience.

174. Not only is Farber’s statement a tortious appropriation of my name and likeness, it is also blatantly false – Elizabeth Moore did nothing heroic or anything that can be remotely construed as “shutting down the Heritage Front”. She provided no evidence to police, nor testified in any proceeding. She was not even a part of the Toronto group. Participating in a publicity blitz and a speaking tour, receiving over a dozen paid and/or unpaid speaking engagements in the years following the group’s collapse, along with a \$12,000 movie deal, does not give Farber or Elizabeth the right to claim she had “shut down the Heritage Front” and to deliberately deceive the Canadian public who watched their appropriations and believed this fraudulent misappropriation. Along with being aired on television, the recording of this episode of The Agenda was broadcast live on Twitter and uploaded to YouTube, where it continues to be accessible to this day.
175. Farber’s statement is part of a conspiracy between Farber and Elizabeth to conflate two women’s narratives; just as in *White Lies*, my courageous actions as a teenager are appropriated without permission, conflated and attributed to Elizabeth Moore. Months after this taping, Farber went on to announce the creation of his new non-profit organization, the Canadian Anti-Hate Network, and brought Elizabeth in as an Advisory Board member and fellow speaker in multiple engagements where her appropriative and false narrative continued to be disseminated. Farber was also present when Elizabeth misrepresented herself on Warren Kinsella’s January 2019 podcast by agreeing that

she had “shut down neo-Nazis”; moreover, Farber followed up this deceptive representation by soliciting donations from the Canadian public.

176. On The Agenda, Elizabeth made another appropriation of my lived experiences when, in response to Paikin’s questions, Moore indicated that she joined the HF when she was “17 or 18 years old” and “in high school”. In fact, *I* was in the Heritage Front at ages 16, 17 and 18. Elizabeth had no contact with the Heritage Front until 1993, at which time she was not a teenager but a 19-year-old adult. Elizabeth was a fringe member whose insignificant role within the Heritage Front lasted 1.5 years at best.
177. Elizabeth never met any Heritage Front members face-to-face until many months after the publication of her first article for Up Front magazine, in May 1993. In her article, she identifies herself as a “women’s libber” and writes “*It is for this reason that I have yet to join the Heritage Front.*” In at least two media interviews – with Tali Koren in Afterword magazine, 2000 and on the Roy Green Show, 2017 – Elizabeth openly states that it was only after her letter-to-the-editor article was published in May 1993 that she was eventually invited to meet other Heritage Front members. In her 2011 documentary, produced for her Ryerson MFA program, Elizabeth clearly states she joined the Heritage Front “*In my early 20s*” – not as a teenager, as she currently claims. A copy of Elizabeth’s article, interviews and film are attached to this affidavit at Exhibit “QQ”.
178. I believe Elizabeth’s birthday is November 1973 – therefore, at the time of publication, she was 19 years and 5 months. Contrary to her false claim at paragraph 64 (c), and in her own words in Up Front magazine and press interviews, Elizabeth did not become involved with the Heritage Front until she was at least 19 years old. She also did not meet any Heritage Front members in person, nor was she invited to any meetings, until the late fall of 1993, when she was 20 years old.

179. I believe that by the time she spoke over the telephone with a Heritage Front member she had already graduated from high school and was enrolled at Queen's University. She was not a teenager, but three months shy of her 20th birthday and legally an adult. At that time, although she may have subscribed to Up Front magazine and listened to hotline messages, she had yet to meet Heritage Front members in person.
180. In her 1997 essay "From Marches to Modems", published with Bernie Farber as editor, Elizabeth writes that she joined the group as an adult: "*Elisse defected from the Heritage Front about the time I became active.*" I defected from the Heritage Front in November 1993, and Elizabeth turned 20 years old in November 1993.

**Elizabeth Moore's Appropriation of my Likeness and Personality on CBC's "Out in the Open" with Piya Chattopadhyay**

181. In January 2018, Elizabeth was interviewed by Piya Chattopadhyay, host of the CBC program, "Out in the Open". As part of this interview, Elizabeth once again made representations to the CBC that she joined the Heritage Front "when she was a high school student": "*She joined when she was a high school student living outside Toronto.*" In the interview, Elizabeth conveys the impression that she was a minor teenager, when in fact she had not joined the group until at least first-year university, at or within 3 months of being twenty years of age. She also claimed that she had been a target of bullying by non-white students at her high school simply because her skin was "too fair".
182. Elizabeth recycles statements I made in a 1994 Vision TV documentary and my 2014 memoir *Race Traitor*. Elizabeth claims that "she had to re-learn her day-to-day activities" after exiting the group: "*I was looking at everything from what I watched on TV to my choice in breakfast cereal through a*

*racist lens.*” This is an appropriation of statements I made both in the 1990s and in my 2014 memoir *Race Traitor*, which are attached to this affidavit at Exhibit “RR”.

1. Vision TV: Me in 1994: *“I still didn’t know who I was because my whole belief system had just completely shattered and I had no idea what I was going to do in the future.”*
2. Vision TV: Martin Theriault, speaking about me: *“[HF ideology] tainted all of her beliefs, all of her approaches, how she would read issues of the press, how she would view the review of a film, how she would look even at the Oscars ceremony, for instance. I mean, everything is tainted through this ideology.”*
3. *Race Traitor* (2014), pages 177-178: *“I recognized everything that came out of my mouth as ideological bullshit, lines that Wolfgang and Ernst had spoon-fed me, but there didn’t seem to be anything left of my old self. It had been eradicated, stripped off. I was a shell with a tough exterior, but as scrambled as an egg inside. Who was I? Could I actually formulate my own opinion about anything, without parroting propaganda? [...] My belief system was my identity. I couldn’t remember who I was before I joined the movement. Everything I did depended on what they’d found acceptable – what clothes to wear, what music to listen to.”*

## **Elizabeth Moore’s Appropriation of my Likeness and Personality on her Website and Social Media Platforms**

### **Website**

183. In March 2018, Elizabeth resumed her participation with Bernie Farber in speaking engagements. Despite the fact that she had no experience with 21<sup>st</sup> century extremism and had no expertise or formal training in the prevention of radicalization, Bernie Farber engaged her to participate in a training workshop where she presented a keynote speech at the Ontario Ministry of the Attorney General’s 2018 Hate Crime Training Conference, to an audience of police, lawyers and government organizations. According to her records, the last time she had spoken to a crowd was on November 9, 2003. Attached to this affidavit at Exhibit “SS” is a copy of Elizabeth’s Twitter announcement.

184. In March, shortly after starting her speaking engagements alongside Farber, Elizabeth created and published her new website, onemooreliz.com, where she posted false and appropriative statements that are still live and accessible as of today's date. Elizabeth's website appears to be heavily influenced by my own website – the interface is different, but it has the same tabs and columns my website has, the same organizational structure of “About”, “Speaking”, “Press”, “Projects”, “Contact me” sections, and I believe it is modelled after my website.
185. On Elizabeth's ‘About’ page, which can be accessed at the URL <https://onemooreliz.com/about/>, she declares that *“From 1992-1995, Elizabeth rose among the ranks to become one of the few prominent female spokespeople in The Heritage Front.”* This entire sentence is false – not only did Elizabeth not join the Front until late 1993, she had not “risen up the ranks” or spoken on behalf of the Heritage Front in any capacity as a female spokesperson. In fact, she had never been a spokeswoman for the group prior to her exit. From 1991-1993, I was the only public female spokesperson for the Heritage Front. In my capacity as an official spokesperson, I participated in multiple rally speeches and interviews with the press, including but not limited to:
- a) Three videotaped Heritage Front rally speeches in 1991 and 1992
  - b) The Montel Williams Show, November 1992 – as a Heritage Front representative, I talk about “my organization, the Heritage Front” and our “thousands” of supporters
  - c) CBC News, winter 1992/1993 where I am filmed distributing HF material in front of a high school alongside HF member Marc Lemire
  - d) Newsreel footage of me accompanying Wolfgang Droege and other Heritage Front members to the courthouse at 361 University Avenue in Toronto

- e) The front cover of The Globe and Mail on February 8, 1993, where a photograph of me standing next to HF leader Wolfgang Droege is accompanied by the statement *“All of 18 years old, she has already undergone careful preparation for a prominent role in the Front’s quest for a softer image. Within months of joining, [Elisa] was addressing major rallies and writing articles for the Front’s newsletter and she’s sure to be trotted out whenever an inquiring journalist shows up.”*
- f) My name appears in multiple alternative news zines published by Anti-Racist Action activists, and I am referenced in Up Front magazine at least 17 times.

186. I reviewed archival copies of Heritage Front’s UP FRONT magazine between 1991 – 1994, specifically Issues #1-5, 8-11, and Issue 16. I was unable to locate UP FRONT 1992 Issues # 6, 7 (where I believe I contributed additional material) and Issues # 12, 13, 14, 15. With the exception of the missing issues, between Dec 1991 – August 1994 I found my name/aliases mentioned 17 times:

- a) 3 articles attributed to “Elisse Deschner”, with a combined print length of 6 pages
- b) 2 letters to the editor and an anonymous article without name credit, that evolved from Elisse’s HF rally speech on December 7, 1991
- c) 5 photos of Elisse (4 photos of me speaking at rallies and 1 photo in an op-ed)
- d) 4 mentions of Elisse in rally coverage / commentary / demonstration outside Don Jail
- e) Elisse is identified by name in UP FRONT on 17 separate occasions of UP FRONT coverage between December 1991 - August 1994, not including my 3 anonymously-written pieces.

187. Elizabeth’s appropriation of my lived experiences, via the false claim that she was “the face” of the Heritage Front, a “prominent spokeswoman” and someone who “rose up the ranks” of the HF is not supported by physical evidence in the Heritage Front’s own records, videos and publications. In my

search through archival copies of UP FRONT magazine, I was only able to find two articles by Elizabeth Moore. Identified as “R. Moore”, Elizabeth (using her middle name Rachele as initial) appears in only 2 articles of 1-page length each, published in the May 1993 issue #10 and August 1994 issue #16 of UP FRONT. Both articles are located at mid- or back of the magazine. It is possible she may have contributed other articles between issue #12 and issue #15, but I cannot locate those issues and Elizabeth has not produced any evidence of her contributions to Up Front magazine. Therefore, I believe that she only ever wrote 2 articles with a combined page total of 2, and one of those articles was a jealous, derogatory diatribe about me. Attached to this affidavit at Exhibit “TT” are copies of my name referenced in the archival issues of the magazine.

188. Elizabeth falsely claims that she “conducted **media interviews, culminating in** her participation in the Canadian documentary Hearts of Hate.” By using the plural form of “interviews” to indicate there had been multiple interviews that led up to and “culminated” in Hearts of Hate, Elizabeth is being deceitful and deceptive. Based on all the research I have conducted in the last 4 years, and Moore’s failure post-litigation to produce any evidence – not even a single photograph or newsreel footage – to attest that she was ever involved in any other media interview aside from Hearts of Hate, I have concluded that her brief appearance in Hearts of Hate was the only public interview she ever participated in prior to her exit from the Heritage Front.

189. Elizabeth’s claim at paragraph 5 is false – she had no contact with the Heritage Front prior to 1993. I worked closely with Up Front editor Gerry Lincoln and spoke with him over the telephone on a daily basis; I also discussed new recruits with both Wolfgang and Gerry, particularly females. Elizabeth was not known to the HF prior to mid-1993; she was simply a magazine subscriber who submitted a letter to the editor in the spring of 1993, which was published as an article in May 1993. Only *after* the publication of her article did anybody in the Heritage Front meet her in person.



190. Elizabeth's statement that she "rose up the ranks" is entirely false. Her only documented appearance as a white supremacist was in *Hearts of Hate*, where I had also been interviewed. Her name is not mentioned in Up Front editorials, or in rally videotapes, at any point in time during her alleged period of "rising up the ranks". In contrast, I can prove that I was a teenager who "rose up the ranks" because of 17 mentions in Up Front, at least 3 rally videotapes, my Globe and Mail article and appearance on multiple newsreel footage, and on the Montel Williams show. Collectively, this evidence proves that I was the only female teenager who rose up the ranks of the HF, became its public face and media spokesperson, and subsequently defected and contributed to the group's collapse by testifying against its leader and key members, and providing affidavits to police.
191. Elizabeth would like for the Court, the press and the public to believe there is little documentation about her involvement in the Heritage Front because the 1990s were an era before digitalization. However, I can readily deliver proof of my involvement and "rise up the ranks" of the organization from multiple sources such as newspaper and television footage, the Montel Williams Show, the 3 rallies where I gave speeches, and the numerous mentions of me in Up Front magazine.
192. In typical Nazi fashion, both the Heritage Front and Ernst Zundel kept immaculate records of their membership and recorded every rally and public meeting. Since 2015, I have evaluated historical archival data from mainstream media networks, newspapers, television and rally coverage, along with the Heritage Front's own rally videotapes – and could not find a single mention or photograph of Elizabeth Moore throughout 1992, 1993, or 1994. In fact, with the exception of the two articles Elizabeth contributed to Up Front magazine and her brief appearance in *Hearts of Hate*, which also featured me and dozens of Heritage Front, Church of the Creator, Hammerskins and other white supremacists, nobody would know that Elizabeth had been associated with the white supremacist movement – much less that she had "rose up its ranks" to become its "pretty, public face".

### Twitter

193. In the spring of 2018, Elizabeth changed her Twitter bio to read that she is “**the verifiable inspiration** of the @cbc film White Lies.” By referring to herself as the verifiable inspiration for “White Lies”, Elizabeth has publicly represented that the story depicted in the film is uniquely her own. Although she claims that I defamed her by publicly asserting that she stole my story and misrepresented it as her own, Elizabeth has failed to prove what she means by “verifiable” since, with the exception of the Hearts of Hate documentary and the two articles she contributed to Up Front magazine, no accounts exist of her involvement with the Heritage Front prior to her “defection”. I believe that Elizabeth is under the false impression that the publicity blitz and articles that accompany the film’s 1998 release, which quote her and Bernie Farber for corroboration and endorsement, are all the “verifiable” evidence she needs to say the film represents “her” experience.

### Reddit AMA

194. In April 2018, Elizabeth hosted a Reddit “Ask me Anything” (AMA) in which she publicized her website and sought to answer questions from Reddit users about her experiences. In the thread of questions and answers, she was asked the following by Reddit User “Omarshamshoon1”: *“I don't say this to be mean, but it kind of sticks out: Have you ever addressed claims that the film "White Lies" is actually based off of Elisa Hategan's life but was marketed as yours while she was in hiding?”* In response to this question, Elizabeth responded by saying: *“Racist extremists target certain kinds of troubled young people, so I suppose it's not surprising that there are others out there who see elements of their own experiences reflected in mine. However, what I shared with the filmmakers was 100% my own.”*

195. Elizabeth’s statement purposely avoids addressing the question of whether my life story was the inspiration for *White Lies*. It instead suggests that the filmmakers were given 100% of her story, when in fact, as Elizabeth herself was aware – and indicated in the February 2015 email that put the blame squarely on writer/producer Dennis Foon – the movie is significantly based on my life.
196. Elizabeth’s answer is attached to this affidavit at Exhibit “UU”, and consists of multiple falsehoods:
- a) “What I shared with filmmakers is 100% my own” implies and is intended to inform others that *White Lies* is 100% based on her story.
  - b) “Others see elements of their own experiences reflected in **mine**” clearly states that all the experiences in the movie are hers alone, and if others see their own experiences reflected in “hers”, they are troubled or not telling the truth. The word “mine” signifies possession = that all of *White Lies* represents Elizabeth exclusively. This statement is worded in a way that conveys full ownership of the *White Lies* storyline. It is deliberately worded so that the individuals who asked the question, as well as the average reader, will interpret this answer as *White Lies* is 100% based on Moore’s experiences, with all others’ experiences being just mere reflections of what is her own (“mine”) life.
  - c) Elizabeth lies about *White Lies* not having anything to do with me – even after knowing me personally for two years, reading my memoir and even admitting in an email that she herself was not the only inspiration for the movie, and that producer Dennis Foon had researched my story via newspapers and court records for over a year.
  - d) Elizabeth implies that I am a “troubled young person” – for stating that a significant number of events depicted in the film were actually based on my life. This response is in line with Elizabeth’s deceitful attempt in her affidavit to portray me as a potentially-violent person who is actively “defaming” and “harassing” her for no reason or cause. Ironically, in her appearance on CTV’s *The Social* in 2019, Elizabeth broadcasts a new lie by claiming that *she* was a “troubled” and “disenfranchised teen”.

## Elizabeth Moore's Post-Litigation Appropriation of my Likeness and Personality

### The Social

197. On January 12, 2019 Elizabeth appeared on the CTV program “The Social” and made false representations to the hosts that once again appropriated my lived experiences. Specifically, that:
- a) She was a high school student when she joined the HF
  - b) She was “the only white kid” in her high school class
  - c) During the interview, Elizabeth represented herself as a “disenfranchised youth” from a “troubled family” – marking a sharp departure from previous descriptions of her family as loving and concerned. At no time in the previous 25 years had Elizabeth ever claimed she was a “disenfranchised teen”, and her use of this deceptive description is an appropriation of my verifiable lived experience as a disenfranchised teen from a troubled family.
  - d) She was the spokeswoman for the HF – by using the statement that she was “used as a mouth piece in every way.” In reality, Elizabeth was never a spokeswoman for the Front.
198. When asked what people can do to stop racism, Elizabeth answers: “I think we need to be confronting if we have some ignorant **uncle at a family dinner** spouting nonsense.” This answer is an appropriation of a line I used in:
- a) My November 2018 Maclean’s article: “And part of that change does involve holding our noses and engaging in conversations that make us uncomfortable. It means **challenging Uncle Bob’s racist tirade during Thanksgiving dinner**”.
  - b) A radio/podcast interview called “The Big History Podcast” which aired on November 18, 2018. At the 9:26 minute mark, I say: “We have to have those uncomfortable conversations [...] with our friends, with our neighbours, with **Uncle Bob at Thanksgiving dinner**.”

Attached to this affidavit at Exhibit “VV” is a copy of the episode and my article/interview.

199. Elizabeth’s repetition of a line I had previously used in both an article and in an interview, combined with her other deceptive comments on The Social, solidifies my belief that she has studied my interviews and articles as a way to further appropriate my experiences and parrot my answers to the media. At paragraph 56 of her affidavit, Elizabeth complains that I made several post-litigation “defamatory” statements about her, and yet she has never stopped her appropriations. On the contrary, by adding the new claim that she was “disenfranchised teen” from a “troubled family” and plagiarizing a line from my article and interview, Elizabeth’s appropriations ramped up after I filed my Statement of Claim in December 2018, leaving me in constant dread of what else she might cherry-pick from my personal history to represent as hers.

#### **Warren Kinsella’s Podcast**

200. On January 25, 2019, Elizabeth Moore, Bernie Farber and Richard Warman were guests on Warren Kinsella’s podcast to discuss the recent conviction of James Sears, the publisher of Your Ward News. The segment involving Elizabeth starts at the 25:40-minute mark and lasts until 37:52. At the 25:40-minute mark, Kinsella starts interviewing Bernie Farber, Elizabeth Moore and Richard Warman. Key points established in this interview:
- a) Kinsella’s very close relationship with Bernie Farber – they have known each other in more than 30 years and have seen each other “in compromising positions”
  - b) Kinsella and Moore’s established friendship, where Kinsella tells Elizabeth, “And we’ve become friends”, to which she replies: “Finally become friends.”

- c) Kinsella introduces Elizabeth with this false claim: “She is no longer a racist extremist – she fights them and **she puts them out of business.**” Just like on *The Agenda with Steve Paikin*, where Farber lied by saying she had “shut down the Heritage Front” Elizabeth does not correct Kinsella but goes along with this false statement, despite the fact that she has never put any neo-Nazi organization out of business. Her complicity in representing herself as a Heritage Front member who “put them out of business” is an appropriation of my lived experiences.
- d) 29:00 minutes into the interview, Elizabeth falsely claims: “I was working for Up Front”. Elizabeth wrote two articles for the magazine. Nobody “worked for Up Front” other than Gerry Lincoln, who ran the entire magazine as the editor. He worked alone.
- e) At 36:40 into the podcast (and repeated again at 36:58), Kinsella states: “Canada is made safer by the 3 of you - Bernie, and Liz and Richard - you guys have made Canada a safer place, you’re part of the big victory today, so the fight goes on. The fight is not stop (sic). But we are grateful to the 3 of you for your efforts in making Canada a more tolerant and safe place.” Bernie Farber goes on to plug Anti-Hate network and solicit for donations, after which they joke “it’s part of the conspiracy, we all work for the Reichmans, we’re all the same person” and they laugh again.

201. The irony of Farber and Kinsella joking about participating in a conspiracy is that Kinsella’s podcast actually does show evidence of conspiracy – a conspiracy where Elizabeth Moore is misrepresented as a Heritage Front member who “put them out of business” when in fact I was the only young woman involved in shutting down the Heritage Front. Following this misrepresentation, Farber and Kinsella go on to solicit donations from listeners and the public, urging them to “Donate as generously as you can!” to the Canadian Anti-Hate Network (CAN).

202. Kinsella and Farber confer prestige and status upon Moore by placing her in the same category of community activism as Farber and Warman, whose track record is established. Then they stand by as Farber solicits for donations to CAN by saying the three of them are “making Canada a safer place”. In this podcast, Elizabeth is cast in the role of national hero, when all she did after leaving the HF was engage in 17 speaking engagements and get a movie deal where she generated an income from appropriating, at least in part, my traumatic lived experiences. A copy of this podcast is attached to this affidavit at Exhibit “WW”.
203. James Sears’ conviction was a result of police and Crown prosecutorial work, not due to Bernie Farber and Elizabeth Moore “making Canada a better place.” Despite Elizabeth having absolutely nothing to do with Sears’ conviction, Kinsella asserts that she is “part of the big victory today.” I believe that the explicit solicitation of funds for the Canadian Anti-Hate Network, particularly following the false assertion that Elizabeth had “put [extremists] out of business” is misleading, reprehensible and possibly fraudulent.

**York Region District School Board (YRDSB) event**

204. At paragraphs 69-72, Elizabeth claims that I contacted the York Region District School Board (YRDSB) and made “defamatory” comments about her. This is false. The letter I sent to YRDSB and the Richmond Hill Centre for Performing Arts consists of comments that are not defamatory, but reflect my truthful, reasonable, and justifiable opinions concerning the facts pleaded within my Amended Statement of Claims. It was intended to highlight concerns involving the veracity of Elizabeth’s narrative as described in the “Say No to Hate” poster itself and previous appropriations in the press; furthermore, informing these publicly-funded organizations that Elizabeth’s narrative was subject to ongoing litigation was not defamatory, but an accurate description of circumstances.

205. None of Elizabeth's events have ever been cancelled as a result of my actions. The venue may have changed to a different location in York Region, but it still went ahead. The fact that the "Say No to Hate" event drew an audience that consisted of approx. 50 persons in the audience – including several security guards/police and the speakers themselves – rather than the "over 200 people" Elizabeth had generously anticipated – is also not my fault, legal responsibility, or due to my private emails to the YRSDB office and the Richmond Hill Centre for the Performing Arts. I never made my concerns public; therefore, if the 200+ people Elizabeth expected to attend did not materialize, it is certainly not due to any "defamatory" actions on my part.
206. As it turned out, my fears were realized when a cell phone video recorded by someone in the audience emerged on the internet showing Elizabeth repeating her appropriations of my lived experiences by conveying the impression that she was a teenager "in high school", "a high school student" and "the only white girl in her class" when she joined the Heritage Front, which is false. Attached to this affidavit at Exhibit "XX" is a videotaped copy of Moore's false statement.
207. In her presentation, Elizabeth also shared slides taken from Montreal's Centre for the Prevention of Radicalization Leading to Violence (CPRLV), an organization I have worked with on at least two separate occasions since February 2018. I traveled to Montreal twice and participated in CPRLV campaigns, including the "What If I was Wrong" campaign and the distribution of a comic book titled "Radicalshow 3: They Are Among Us" based partially on my life as a teenager, to schools across Quebec. I also assisted the CPRLV with information, interviews and details that I believe were used in the development of the radicalism-prevention slides Elizabeth shared.
208. Because of Elizabeth's choice to use CPRLV's slides as part of her presentation, Bernie Farber's friend and YRDSB Equity Team officer Aneta Fishman represented Elizabeth as being part of the CPRLV in a tweet posted that evening. Instead of correcting Fishman, Elizabeth retweeted this to



her followers – further blurring the line between my work/professional identity, and her own.

Attached to this affidavit at Exhibit “YY” is a copy of Fishman’s tweet.

### **Bernie Farber’s Relationship with the York Region District School Board**

209. I met Aneta Fishman in February 2018 at a meeting of the Sisterhood of Salaam-Shalom, a social group for Jewish and Muslim women where we are both members. At that time I introduced myself and told her about my work and that I’d just returned from Columbia University, where I gave a talk on extremism, hate and radicalization. I asked her about how I could apply to potentially speak or participate in YRDSB events. Aneta informed me that she would let me know, and told me that she had recently invited Bernie Farber, Len Rudner and Evan Balgord to conduct a 5-part workshop series for the York Region District School Board. Therefore, as of February 2018 Fishman was aware of my work in the field and my desire to participate and offer consulting work for YRDSB.
210. Aneta and I communicated briefly on Twitter, where she called me “an inspiration”. Her exact words were: *“I’m so incredibly lucky to have met you Elisa. Thank you for the amazing support and kind words. You are an inspiration!!<3”* Weeks later and without any explanation, Aneta blocked me from her personal Twitter account; on that day I was also blocked from the public @YRSDBInclusion Twitter account without explanation. While I cannot prove that it was Fishman who blocked me from the public YRDSB platform, both blocking episodes happened on the same day and Aneta, along with Cecil Roach, heads the YRDSB Equity team. While I do not know the reason why Fishman blocked me from her Twitter account, I feel that my being blocked on the official YRDSB Inclusion Twitter account constitutes overstepping boundaries in one’s public role as a YRDSB employee. Attached to this affidavit at Exhibit “ZZ” is evidence of YRDSB’s bias.

211. The public @YRDSBInclusion platform is an open extension of YRDSB and they had no cause to block me. I never communicated with that platform, never engaged in tweets or DMs with them, and was merely following them in order to obtain news about future events where I might participate, either as an attendee, consultant or speaker. The fact that YRDSB used their own public social media account to exclude me without any cause, reflects a deliberate and intentional move on the YRDSB to block me from accessing news about potential engagement opportunities. This bias against me by the YRDSB Inclusion team preceded the “Say No to Hate” by at least one year. The only explanation I can think of for why I would be blocked from finding out about YRDSB activities or applying to be a consultant is due to Aneta Fishman’s preexisting friendship and working relationship with both Bernie Farber and Len Rudner. Attached to this affidavit at Exhibit “AAA” are copies of Fishman’s gushing tweets and repeated praise of Farber and Rudner, and my communication with YRDSB Superintendent of Equity and Engagement Cecil Roach.
212. On Friday, February 22, 2019 I spoke over the telephone with Cecil Roach, who admitted that Bernie Farber was a friend who he had known, and on occasions worked with, since Farber’s days as Director of the Canadian Jewish Congress. Roach also indicated that Farber and Len Rudner had been brought into YRDSB on several occasions in prior years to present or give workshops. I expressed that my concerns with YRDSB extended beyond my ongoing lawsuit against the Defendants and into a situation that reflected, in my mind, a deliberate bias against me from the YRDSB Inclusion office, particularly in light of the fact that I was blocked by Roach’s employee(s) from seeing events and opportunities where I too could apply to participate in Equity events.
213. During my phone call with Cecil Roach, I asked him why he and Fishman were giving projects to their friends and their friends’ non-profit organization the Canadian Anti-Hate Network, while blocking their friends’ competitors from accessing similar opportunities within the York Region

School Board. I asked him why he and Aneta Fishman had persistently hired Bernie Farber for projects across a span of several years without making their procurement process open and available to other consultants, and why I had been blocked by the @YRDSBINclusion Twitter page and prevented from learning of opportunities where I too might apply as a facilitator. Mr. Roach seemed irritated and defensive, and was unable to give me an explanation.

214. Following our telephone call, I sent an email to Cecil Roach outlining my concerns about potential collusion and nepotism between the York Region District School Board's Equity and Inclusion office hiring Bernie Farber repeatedly, while blocking me – a competitor offering similar services who is currently engaged in a lawsuit against Farber. I detailed the following issues:

- a) **Breach of communication protocol:** the official communique directed to the Equity email address made its way to the Defendant's lawyer before anyone from YRDSB actually contacted me regarding my concerns. I received an aggressive Cease & Desist letter from Elizabeth's lawyer – claiming my email had already caused “significant losses” – before I even spoke to a Board official. I had emailed the YRDSB office at 9:29 PM on Wednesday evening and received the C&D letter on Thursday at 5:31 PM, before even speaking to the Superintendent of Equity on Friday afternoon. I believe Aneta Fishman is responsible for monitoring the YRDSB Equity team emails, and I believe that she emailed my letter to Farber and/or Moore as soon as she received it in her inbox, and before speaking with Roach and other YRDSB officials.
- b) **Bias and unfair procurement process:** At the time I met Aneta Fishman, Principal-Equity Education at York Region District School Board, I asked her about the process for finding out about and participating in events for the Equity team of YRDSB, and

Aneta said that she would let me know. Aneta never provided this information to me.

Instead, within a month she blocked me from her Twitter account on the same day I was also blocked from the official YRDSB Inclusion/Equity office Twitter account.

Subsequently, the YRDSB Equity team continued hiring Bernie Farber, and now Elizabeth Moore, for the “Say No to Hate” event in April 2019.

- c) **Violation of YRDSB’s Mandate** Fishman and the YRDSB Equity Office is showing preferential treatment and unfair practices in their procurement of service providers. The YRDSB mandate for purchasing of services is to be accountable and ethical with fair, open and transparent procurement processes for the acquisition of goods and services. In my opinion, the York Region District School Board’s Equity office has not acted in the spirit of this purchasing mandate by hiring friends of their Equity team leaders and excluding me without cause or explanation. YRDSB’s statement for its purchasing of services: (<http://www.yrdsb.ca/AboutUs/Departments/Purchasing/Pages/default.aspx>)

*Our Mandate: York Region District School Board Purchasing Services' Mandate is to be accountable, ethical and fiscally responsible in protecting public funds. It is the department's goal to achieve best value for money. We adhere to all procurement laws, regulations, rules, acts and the Broader Public Sector Procurement Directive in our efforts to serve the public interest with fair, open and transparent procurement processes in the acquisition of goods and services.*

- d) **Blocking potential economic opportunities and biased treatment:** In spring 2018 someone from the YRDSB Equity office blocked my access to the public YRDSB Twitter account without cause, ensuring I could not see opportunities to participate in Equity events. Despite informing Cecil Roach about this matter, I am still blocked.
- e) **Not acting as a neutral party:** The fact that Aneta Fishman was aware of my concerns but continues to book Farber (who is a direct competitor for projects in the same subject

area) for speaking events, shows prejudice and bias against me in favour of Bernie Farber and his associates. YRDSB, as a publicly funded institution, has not acted in a neutral way in regard to my concerns and civil litigation. To this day, the @YRDSBInclusion Twitter page continues to block me and I cannot access news of opportunities where I could apply as a consultant, while Fishman – who is a social media friend of Bernie Farber – continues to retweet, interact with and show her support for Bernie Farber.

### **Parents for Peace**

215. At paragraphs 73-77, Elizabeth alleges that I sent defamatory statements to the organization Parents for Peace, and they resulted in her being uncertain about her future with the organization. I deny that any of my communications with this organization were defamatory in any way. After the organization made the public announcement of Elizabeth joining their network on their Twitter account, and I discovered that her bio referred to her as a “high school student” when she started her involvement with the Heritage Front, which is a lie, I contacted them to inform them of the ongoing litigation and gave them a copy of my Amended Statement of Claim. Furthermore, after Elizabeth began to represent herself as an “Advisory Board” member of this organization both on her social media platform and during a public speaking appearance, I asked them to clarify her position.

216. On May 28, 2019 I received an email from Myrieme Churchill, the Executive Director of Parents for Peace. In the email, which I have attached to this affidavit at Exhibit “BBB”, Ms. Churchill indicated that despite Elizabeth’s misrepresenting herself as an “Advisory Board” member of their organization, she was only a volunteer member of an extended network of affiliates:

*Elizabeth Moore joined our organization as a member of our network. Network members do not have any official status and do not speak for Parents for Peace in any legal or official capacity.*

***Elizabeth Moore is not part of the Board of Directors, Advisory Board, or an employee at Parents for Peace. We have no legal or monetary contract with Ms. Moore. While we carefully vet***

*information contained in our official materials, we are, obviously, not responsible for the writings or speech of individuals who happen to be P4P network members.*

217. I believe this email clearly indicates that Elizabeth widely misrepresented herself to the public and her social media followers as having a position of authority or influence with this organization, which in fact she does not have. Whatever expectations Elizabeth had of this organization, as well as any opportunities she believed she would gain, which she alleges I caused her to lose by informing them of the ongoing litigation, are a figment of her imagination – as evidenced by her claim at paragraph 75 of her affidavit: “*I am uncertain about my **working relationship** with Parents for Peace.*” As indicated by Ms. Churchill, Elizabeth was never formally employed by the group and there were no financial rewards offered as part of her involvement in a network of volunteers. This voluntary position did not come with remunerations or any legal or monetary contract, and I do not believe that Elizabeth is entitled to damages for a position that came without benefits, promises or financial expectations.
218. I do not know if Elizabeth was ever officially invited to be part of the “Advisory Board” or “Board” of Parents for Peace, but in her May 28, 2019 email the Executive Director clearly states that Elizabeth is not an “Advisory Board, or “Board” member. However, as of May 28<sup>th</sup> and for the following month, Elizabeth continued to represent herself as the “Advisory Board” member of an organization whose Executive Director categorically denies such an appointment.
219. It is my understanding that Elizabeth finally changed her Twitter bio to remove this line in August 2019. Based on Ms. Churchill’s letter, I believe that Elizabeth has fraudulently represented herself to the community as something she is not, which illustrates a pattern of behaviour where she enhances her credentials with falsehoods and appropriations in order to legitimize her claim of expertise in the subject of radicalization.

220. I believe that if Elizabeth experienced repercussions, if any, they were due to the fact that Executive Director Myrieme Churchill became aware that Elizabeth has misrepresented herself on her Twitter account as a “Board” member of Parents for Peace, and had spoken publicly at an Ottawa hearing about online hate while representing herself as an Advisory Board member of the organization, even though she was not authorized to speak on their behalf and represent herself as such.
221. If Elizabeth experienced any fallout whatsoever with Parents for Peace, I believe it is due to her fraudulent misrepresentation of a position and role she does not possess. It is likely that Elizabeth’s decision to advertise herself on social media and in the community as a Board member of an organization that did not appoint her as such, might have a negative impact on their decision to approve her as a volunteer. The act of me informing the organization of my pending litigation against Moore, whose bio (published on their website) contains statements I believe are appropriative of my experiences, and fact-checking by asking them to clarify whether Moore is indeed a Board member of their organization, is not illegal nor defamatory.
222. I do not believe that Elizabeth’s role as a volunteer member of their network has changed, since her biography remains published and listed on the Parents for Peace website. At paragraph 76 Elizabeth complains that her photo “has been removed”. I believe this is due to a malfunction of their website because the location where the photo should have displayed is still marked with a place holder icon. Since I am not their website developer or web-support tech, I have no idea why her photo does not display accurately while the rest of her bio is unaffected by any glitches, but I am certain that I had nothing to do with it.
223. Due to the fact that as of today’s date Elizabeth’s profile bio continues to be published on the Parents4Peace’s website and the @ParentsForPeace Twitter account follows Elizabeth on Twitter and has liked or retweeted her tweets on multiple occasions, I believe that Elizabeth’s claim that my

messages to this organization has caused a rift between herself and the group is false. Moreover, she has suffered no damages or negative impact as a result of my correspondence with the organization.

224. Without an affidavit or testimony evidence from Parents for Peace director(s), it is impossible to determine whether Elizabeth experienced any fallout - and if she did, whether it is as a result of my correspondence to the organization, or due to Elizabeth's own deceptive behaviour and deliberate choice to fraudulently misrepresent herself (on social media and in real life) as a Board member of an organization whose own Executive Director denies she is a Board member of. Lastly, since Elizabeth's role in the group is defined by their Executive Director as an unpaid, strictly voluntary member of an extensive network of other voluntary members, and carries no financial or other benefits that I am aware of, or that are indicated on their website or any other public platform, I do not believe that Elizabeth suffered any financial loss or damages, nor has she provided any evidence of such damages.

### **The CAERS Tape**

225. In January 2019, I was contacted by a friend and director of the Canadian Anti-Racism Education and Research Society (CAERS), a non-profit organization that has tracked hate groups and fought extremism since the early 1990s. I was informed that the board of CAERS had decided to share with me the transcript and footage of a 1995 videotaped interview with Elizabeth Moore filmed shortly after her exit from the Heritage Front. The interview was part of extensive filmed footage intended for a documentary about far-right extremism; I believe the film was eventually made, but Elizabeth's interview ended up on the proverbial cutting room floor. The interview is approximately 90 minutes. A copy of the transcript and footage is attached to this affidavit at Exhibit "CCC".



226. The CAERS tape is extremely relevant because it provides a snapshot of Elizabeth’s mindset and storyline in 1995. Filmed within months of her departure from the Heritage Front, it can be viewed as an exit interview that captures who Elizabeth was at the time she started appropriating my lived experiences, well before her story became revised and underwent new evolutions. In the video she is not the highly-regarded wife of a lawyer (as she claimed to be in the Ottawa Citizen) or the recipient of multiple higher-education degrees, but the person she really was at the time she began to fraudulently appropriate my traumatic lived experiences, three years before the release of White Lies enabled her to conflate my life with hers and monetize it into the 21<sup>st</sup> century.
227. The CAERS tape is divided into 4 sections – tape 18, 19, 20 and 21. In the interview, Elizabeth makes the following statements:
- a) Tape 19: *“It was really scary I guess **the day that I decided to make a conscious effort to leave** was at a HF gathering over Thanksgiving. And **they were showing a tape of another female activist, Elisse Hategan** who had been a member of the HF and had defected a year or so before that airing date, and everybody was making fun of her, and saying all those nasty things about her. And as she was saying these things about what the HF had done, things that I had been lied to about. ...there was one part of Elise Hategan’s show where they asked her what was it like, the day that you left, and she said quite sincerely that it was the most wonderful day of her life. **And something in me just snapped, and I thought to myself I wish I could say that**”.*
  - b) Tape 18: *“I was first recruited **when I was 18 years old**”* – this is false, and contradicted by Elizabeth’s own statement at 18:16:40, where she says, “The first thing I did that was active was that I wrote an article of complaint,” referring to the article she published in May 1993, when she was 19 years and 7 months old. Elizabeth then admits that she met

- Wolfgang sometime after her article came out: “When I met Wolfgang for the first time, which was the first time that I had had contact with the leadership, he expressed the sentiment that it was really good”.
- c) Tape 18: “In my high school where only 20% of the student body was white” – Elizabeth has consistently asserted that she was in a white minority at her school; while her figure of 20% may or may not be accurate, the important thing to note is that nowhere in the entire CAERS tape does Elizabeth claim she was “the only white kid” or “the only white girl” in her class. I believe this appropriation materialized only in 2017 – 22 years after she had left the Heritage Front, 3 years after she read my 2014 book *Race Traitor*, and only 2 years after the Toronto Star wrote a profile about me in which they used this line.
- d) Tape 18: *“They wanted me to take on the role as the token woman. [...] And so they really encouraged me to **write articles, write letters, make speeches, eventually become the media spokesperson for them in the hopes of helping them maintain that softer image** that they had originally tried to portray to the media.”* This statement shows that as of 1995, Elizabeth’s fraudulent appropriations of my lived experiences were already underway. In her statement, she describes my role in the HF to a tee, including the “softer image” line that was said about me in the February 1993 Globe & Mail article that features a photograph of me and Wolfgang. Unlike me, Elizabeth never made speeches and was never a media spokesperson, as reflected by the utter lack of evidence of her involvement in the Heritage Front with the exception of two 1-page articles and a brief appearance in *Hearts of Hate*. The HF videotaped every speech and rally, and Elizabeth is not present in any of them. This is irrefutable proof that Elizabeth is lying.

- e) *“I attended court when one of our boys was up on some charges, I would show my support. I would visit members in jail. I made speeches at meetings. More or less if it was legal I did it at least once.”* – This is false. Elizabeth never made a single speech at any Heritage Front meeting, which were all recorded. If she had been present at a single rally, she would be on tape. Elizabeth also did not attend court “when one of our boys” was up on charges – this is an appropriation of my lived experiences: there is actually news footage of me accompanying Wolfgang to and from the courthouse, and I was filmed and photographed in front of the Don Jail when the Metzgers were incarcerated there in 1992. Elizabeth attended university in Kingston and only visited Toronto sporadically. The only time she was in a courthouse was to witness my testimony in the Human Rights Commission trial. I don’t believe she ever visited anybody in prison; I, however, did, along with corresponding with a prisoner.
- f) At Tape 21, Elizabeth changes her story and says that she was removed “from the violent side” of white supremacy: *“For me, when I was in it the hate landscape was more or less spouting off things in coffee shops, and writing articles and playing around on the internet.”*
- g) Tape 21: *“I became the media spokesperson for the HF, and I also started working on the hotline.”* – This is mutually-irreconcilable. Between 1992-1994 there was a court injunction banning the Front from operating ANY hotline. Moore would have been in violation of that injunction and charged with obstruction of justice if there had been any proof that she was an official HF member, much less “THE media spokesperson”. In 1994, Wolfgang Droege had just come out of jail after serving 3 months for setting up Ken Barker (an official HF member) with a secondary hotline,

and backdating a resignation letter. I was the key witness in that conviction. Droege would never risk going to prison again for obstruction of justice by setting Moore up with a hotline (in the same year!), and then still using her to represent the Heritage Front. They wanted someone at arm's length, in a different city, separate from HF.

### **Elizabeth Moore's Appropriations of My Endangerment and Defection**

228. In multiple interviews from 1995 leading up to 2019, Elizabeth has labeled her uneventful exit from the Heritage Front as a "defection" that caused her to face endangerment. At paragraph 64 (f) Elizabeth falsely claims that she feared that "*members of The Heritage Front would find me, threaten me, or engage in acts of violence against me. This is my opinion based on my own lived experiences.*" The truth is, Elizabeth's "fears" are not based on her lived experiences, but a direct appropriation of my lived experiences, threats and circumstances where I faced real danger following my defection and testimony against the Heritage Front.
229. Elizabeth repeatedly makes this false statement in the following publications, copies of which are attached to this affidavit at Exhibit "DDD":
- a) "*I get worried sometimes I might get a letter bomb in the mail,*" she says quietly. "*I'm a marked woman now.*" - "The Enemy Within", by Marci McDonald, May 8, 1995.
  - b) "*Because she still fears reprisals from the movement she abandoned, she asked that her location not be revealed.*" – "Postcard from a Hate-Filled Past", by Doug Saunders, The Globe and Mail, March 28, 1998.
  - c) "*'Defection' is the word Elizabeth uses to describe her disassociation from the Heritage Front, as though the Front is a hostile country, one with agents that might be lurking just around the next corner, waiting for her.*" [...] "*I've had daydream-nightmares that someone will come running up to me in the street and punch me in the face.*" [...] "*braces herself for less optimistic events*". "Coming Back from the Front". The Queen's Journal, November 10, 1995

230. Elizabeth Moore was not involved with the Heritage Front enough to merit being rescued, or to claim that she underwent a “defection.” In 1995 she took a year off school to move into Toronto’s Annex neighbourhood, renting a room at 441 Clinton Street, a street where several Anti-Racist Action members lived and where incendiary confrontations between HF and ARA had happened. Two of the addresses Grant Bristow gave skinheads instructed to terrorize people were homes at 469 and 618 Clinton Street. Elizabeth’s choice to live on Clinton Street was a move that could be considered suicide if the Heritage Front were really out to get her. The word “defection” to describe someone who moved INTO the epicenter and hotbed of HF and ARA clashes is incongruent with the behaviour of someone who genuinely fears for their life. I believe that Elizabeth’s decision to move into that epicenter reflects her desire to be seen and recognized, rather than to hide as a result of endangerment. A copy of this evidence is attached to this affidavit at Exhibit “EEE”.
231. Elizabeth’s egregious use of the word “defection” in interviews with the press and on her website is intended to convey the false image that she experienced endangerment, or possible threats, after her Heritage Front departure. While I was disguising my appearance, using aliases and trying to relocate as far from Toronto as I could arrange to be, Elizabeth made the concerted effort to take a year off from her studies at Queens University in Kingston and actually moved to Toronto, renting a place in the “eye of the storm” in order to participate in multiple speaking engagements and publicity/press opportunities alongside Bernie Farber. That she would move to downtown Toronto and go on a speaking tour with Farber while I was in hiding for my life and digging food out of garbage dumpsters to survive, and claim she “defected” and was “in danger”, is an insult to everything I endured in order to escape the Heritage Front and to shut them down.
232. Elizabeth’s deceptive use of the word “defection” is an appropriation of my lived experiences, and was used by several journalists, in news and documentaries, for up to 2 years preceding Elizabeth’s

uneventful exit from the Heritage Front. Specifically, the word “defection” was used to describe my dangerous escape from the Front, followed by my testimony and life in hiding. It was used in articles published by the Toronto Sun, the Toronto Star, the Vision TV documentary “It’s About Time” and in the “Hearts of Hate” documentary, in national news segments, as well as in court testimony transcripts.

233. I don’t know if Elizabeth truly understands the ramifications of the word “defection”, although as an English major, I hope she does. My mother defected from communist Romania and my family incurred Securitate questionings and a life of scrutiny and austerity leading up to our emigration to Canada. I risked my life to get away from the Heritage Front after doing everything I could to shut them down. Perhaps in Elizabeth’s mind, “defection” simply means going on a speaking tour. Whenever she was asked by journalists if she experienced any repercussions as a result of her “defection” from the Heritage Front, Elizabeth acknowledged that she had incurred no threats. In her own words, her “defection” consisted of simply changing her telephone number and walking away from the Heritage Front. No members bothered to talk to her, and the worst thing that happened is that her ex-boyfriend sent flowers to her parents’ house.
- a) On The Agenda (September 2017), Steve Paikin asks: *“Just to clarify. Once you eventually did extricate yourself from the group, were there any consequences, physical and-or emotional and otherwise?”* Elizabeth Moore: *“Fortunately the consequences from Heritage Front members were minimal, and I’m to this day very grateful for that. There were some awkward things from my ex-boyfriend. He sent flowers to my parents’ house.”*
- b) CBC’s Out in the Open (January 2018): Piya Chattopadhyay: *So in ‘95 you walk away? It’s as simple as that?”* Elizabeth Moore: *“I walked away. Yeah. It was simpler because I wasn’t in Toronto at the time. Living in Kingston, there was really only a handful of other people involved in*

*the movement who were out there, and none of them that I was particularly close to, so I changed my phone number, I...you know, got a PO Box so that, you know, I wouldn't have mail traced directly to where I was living at the time, and I ended up taking a year off just to kinda get my...catch my breath and sort myself out, and then went back in and finished my education.”*

- c) CAERS Tape 19: *“The easiest thing for me was the last severing all ties with them, because I wasn't living in Toronto at the time, and all I had to do is change my phone number. And that was it. So the day that I can say that I actually did leave was quite anti-climactic. Because **nothing happened** except for Bell Canada phoning me and saying this is your new number.”*

### **Elizabeth Moore’s Appropriation of My Role in Shutting Down the Heritage Front**

234. In a paper called “From Marches to Modems”, edited and published by Bernie Farber, Elizabeth writes that she first experienced doubts about being a neo-Nazi after the Hearts of Hate documentary aired and she experienced backlash from Queens University academics. This, coupled with her admission in the CAERS tape that the Heritage Front was on the verge of collapsing and were losing members “left and right” and that on the night she saw my Vision TV documentary she thought to herself “Something in me just snapped. I thought to myself, I wish I could say that” reflects what I believe is the true reason for Elizabeth’s exit from the HF – a woman preoccupied with her “good girl” image, who disliked that she was being looked at in a negative light on campus, suddenly seeing an opportunity to duplicate another girl’s story and ride the same bandwagon.
235. The fact that Elizabeth admits she was experienced backlash at Queens University after Hearts of Hate aired demonstrates that prior to the film’s release, nobody on campus really knew who she was – and that she certainly was not “the pretty, public face” of the Heritage Front. This reality is further confirmed by Elizabeth’s own recollection at paragraph 10 of her affidavit, where she speaks of

being present at an event held at Queens University where Bernie Farber recognized Elizabeth as a Heritage Front member, but did not disclose this fact to the crowd of 200-300 anti-racist activists who were in attendance. She claims that if Farber had identified her as a Front member, her safety might have been at risk. However, at paragraph 5 of her affidavit, Elizabeth writes that she participated in media interviews and was *the* Heritage Front's public spokeswoman.

236. Elizabeth's claim to have been "The Face" of the Heritage Front and the fact that NO anti-racist activists in a 300-person crowd recognized her at an anti-racism meeting held on the Queens campus in Ontario is incongruent. The Heritage Front was in the headlines and the people associated with it were prominently featured in news segments and press material. As the only female public face of the Heritage Front, I was being recognized on the streets of Toronto, Ottawa and Montreal. ARA posters were distributed in my neighbourhood, "outing" me and 4 other HF leaders. Wolfgang Droege enjoyed being in the limelight and often spoke of being recognized wherever he travelled in Ontario. The fact that Elizabeth claims to have had a prominent role, but was not recognized by a single activist in attendance at an anti-racist meeting specifically discussing how to shut down the Heritage Front highlights the fact that she was not a prominent member of the organization, much less its "pretty, public face".
237. By her own admission, Elizabeth decided to leave the Heritage Front on the very night she saw a documentary about me. In a 1995 video interview with CAERS, at the 2:45 minute mark, Elizabeth states that after seeing my story, "***Something in me just snapped. I thought to myself, I wish I could say that.***" Furthermore, in a 1995 interview with Queen's University, she repeats this fixated wish by describing my documentary and stating, "***I wish it was me saying that.***"
238. Elizabeth cannot truthfully claim to shut down a group that was almost defunct by the time she decided to leave it. In her interview with the CAERS team, she admits in her own words that prior



to her exit from the Heritage Front, “they were losing people left right and centre.” Her assertion that the speaking engagements where she “speaks out against hate” after 1995 merit in any way, shape or form the claim that she “shut down the group” is not only irresponsibly false, but also a clear appropriation of my substantial actions in shutting down the group.

239. Several activists risked their lives to fight the Heritage Front, most notably the Native Canadian Centre’s Rodney Bobiwash, who filed the initial complaint to the Human Rights Commission that led to the hotline injunction, as well as the street activists who were terrorized, stalked and beaten by neo-Nazis. To suggest that a privileged, affluent woman who appropriated my lived experiences and found fame and fortune with the help of Bernie Farber’s endorsement, had anything to do with the Front’s collapse is an insult to the brave actions of all who actually risked their lives.
240. Elizabeth’s statement at paragraph 37 of her affidavit, where she states that she does “not agree” that I “deserve exclusive recognition for being the only young woman who was involved in shutting down” The Heritage Front is clear evidence of Elizabeth’s entitlement over my lived experiences and her delusion that she is within her right to claim that she had something to do with the collapse of a group I risked my life to shut down – all the while she was busy capitalizing on a movie deal and numerous speaking engagements.
241. In the CAERS tape, Elizabeth admits that she made the decision to end her association with the Heritage Front during Thanksgiving weekend 1994, on the night she saw a Vision TV Documentary about me and decided that “I too wanted to say those things”. By that time, the Front was already in decline and nearly defunct, significantly as a result of my actions. Just before Elizabeth decided to jump off the Heritage Front sinking ship, the following events had taken place:

1. I provided approx. 30 affidavits to the OPP about HF crimes and illegal weapons (November 1993).
2. I testified against Wolfgang Droege, Gary Schipper and Kenneth Barker (March 2014)
3. The 3 men were convicted and sentenced to jail during the summer of 1994, leaving the group without a leader.
4. On 14 August 1994, while Wolfgang Droege was serving his sentence in prison, Bill Dunphy of the Toronto Sun published an expose that identified Grant Bristow, the co-founder and co-leader of the Heritage Front, as a CSIS mole. CSIS swept in and moved Bristow right away into Witness Protection, leaving the group without any official leader.

#### **Elizabeth Moore's Appropriation of my Age and Entry Point into the Heritage Front**

242. In the last twenty-five years, I have consistently established that I joined the Heritage Front in 1991, as a 16-year old teenager. My story has never changed. This fact is further cemented by archival records and my appearance as a speaker at a public Heritage Front "Martyrs Day" rally on December 7, 1991 – 10 days shy of my 17<sup>th</sup> birthday. Elizabeth Moore's story, however, has switched numerous times across the years.
- a) In the CAERS tape, when questioned about what age she was when she first joined the group, Elizabeth stumbles over her answer, changes it and appears confused, flustered, possibly deceptive, and finally asks the interviewer to repeat the question.
  - b) In press interviews from 1995-1998, Elizabeth continuously changes her age and represents herself as having been 16, 17 and 18 years old. Specifically:

- a) *“Ms. Moore started her descent into Canada’s racist right in 1991 as a Toronto high school student”* – “A Life Once Soured by Hate Finds Sweet Understanding”, by Adrian Humphreys, National Post, July 29, 1999.
- b) *“In her teens and early 20s, Elizabeth Moore was the youthful face of Canadian intolerance”* – “Postcard from a Hate-Filled Past”, by Doug Saunders, The Globe and Mail, March 28, 1998
- c) *“Elizabeth says she first became involved with the Heritage Front in grade 11 or 12.”* – “Coming Back from the Front”. The Queen’s Journal, November 10, 1995
- d) *“Moore, who was recruited to the neo-Nazi group while she was in grade 12 in Scarborough.” [...] Moore, 28, spent her late teens and early 20s as a vocal member of the white supremacist group Heritage Front – running the organization’s telephone hotline and serving as its official mouthpiece”.* – Toronto Star, March 21, 2002.

This is false – Elizabeth was set up with a hotline independent from the official hotline, which had been shut down after Judge Joyal’s injunction. She never ran the official Front hotline, and never served as the HF’s “official mouthpiece”.

Elizabeth’s website cites several other articles and television appearances that are not digitalized or accessible to me; however, given her clear pattern of inconsistent narrative and appropriations of my lived experiences, I believe these sources contain further appropriations of my story.

- c) In her 2011 documentary “In God’s Keeping”, produced for her MFA degree at Ryerson University, at the 3:52-min mark, Elizabeth says that she was a neo-Nazi “In my early 20s”.
- d) In a Facebook Messenger conversation with me on April 7, 2014, Elizabeth tells me that she was in the group “from ages 19-21, I think”.
- e) After 2017, Elizabeth returns to her lie of having been a “teenager” when she joined the HF, in interviews with the Ottawa Citizen, The Agenda, CBC Radio, The Social, The Roy Green Show, on her website, and in her April 20, 2018 article in Macleans Magazine, where she claims she was a “card-carrying member” of the Heritage Front on or within months of being 17 years old, which is an incontrovertible lie.

- f) The first article Elizabeth wrote for Up Front magazine, where she writes that “I have yet to join the Heritage Front” was published in May 1993 – this date-stamps her actual entry into the group. As of May 1993 – when she was 19 years and 7 months old, Moore had NOT joined the HF. Her claim in her Macleans piece that she was a “card-carrying member” at or around age 17 is an incontrovertible lie, given that she was an adult and attending Queens University in Kingston, ON by the time she wrote that first article for Up Front.
- g) In an interview with Talli Koren in Afterword, Winter 2000, Moore states that “until she wrote her first article for the Heritage Front’s magazine, Up Front, her involvement was limited.” Koren states that Moore’s article “appeared in “Up Front’s Issue of May 1993.” On the Roy Green Show on August 20, 2017, Moore tells Andrew Lawton: “I was really brought in when I ended up writing a letter to the Editor of the Heritage Front’s magazine because there was a piece I disagreed with.” Only after she wrote that article for Up Front, was she invited to an HF meeting: “you should come and join us at this meeting here.”
- h) In May 1993, Moore was an adult. In the From Marches to Modems essay, Moore admits in her own words that she joined in 1993: “*Elisse defected from the Heritage Front about the time I became active.*” I defected in November 1993, so by Moore’s own account she only became active in the HF throughout 1994, and left in Dec. 1994. This is corroborated by her admission in “Hearts of Hate”, which was filmed when she was 20 years old and in second year of university, that her activity in the HF had taken off only “in the past six months”.

Attached to this affidavit at Exhibit “FFF” are copies of Moore’s inconsistent and appropriate statements, as listed above.

### **Elizabeth Moore’s Appropriation of my Troubled Home and Disenfranchised Status**

243. No family is perfect – but in Elizabeth Moore’s case, her evolving narrative shows a dramatic shift from how she has portrayed and reinvented herself over the years. Prior to 2019, Elizabeth’s description of her family was glowing and very positive – in her own words, she had not been beaten or abused by her loving parents. An only child born to middle-class parents, Elizabeth grew up in a comfortable house, located in a safe neighbourhood. Her parents paid for university and extracurricular activities such as rhythmic gymnastics classes and other youth activities. In multiple interviews from 1995 – 2018, Elizabeth describes herself as coming “from a good home” and being raised by two loving, involved parents who took interest in their daughter’s studies and upbringing.

- a) “I was that nice, quiet person who came from a good home.” Ottawa Citizen, Aug. 2017
- b) “I wasn’t getting beaten at home or anything.” – The Agenda, Sept. 2017
- c) “My mother returned home from a parent-teacher interview night” – Macleans, Apr 2018
- d) “My parents are still together, no I wasn't abused, no I didn't come from poverty line family. I came from the middle class.” – CAERS, Tape 21, 1995
- e) “[My parents] didn't do anything actively like say if you don't stop hanging out with them we're going to take your university money away. They didn't do anything like that to me, **they always supported me.** Supporting me and helping me go to school and finish my education.” – CAERS interview, Tape 20, 1995.

A copy of the above statements is attached to this affidavit at Exhibit “GGG”.

244. Elizabeth’s January 2019 appearance on The Social marks a dramatic shift in her narrative, and what I believe is a new and serious appropriation of my lived experiences. During the interview,

Elizabeth represented herself as a “*disenfranchised youth*” from a “*troubled family*” – marking a sharp departure from previous descriptions of her family as loving and concerned, to a closer representation of my troubled, disenfranchised teenage years.

245. As part of preparing for this action, I have reviewed numerous articles and interviews across twenty-four years where Elizabeth described her upbringing, and at no time have I found evidence where Elizabeth indicated that she came from a family that was anything but loving, concerned and protective of her. Based on her documented history of inconsistencies, changing narrative, reinventing herself and a tendency for exaggeration, I do not believe that Elizabeth is being truthful in her claim at paragraph 64 (a).
246. Contrary to her 2019 revamped image as a former “disenfranchised teen”, I believe Elizabeth’s childhood and upbringing was the epitome of “franchised”. I find it highly suspect that suddenly, and as a result of being put to strict proof in this lawsuit, Elizabeth now claims that her father was an alcoholic. Given the alternative of admitting that she lied on The Social, I do not find it outside the realm of possibility that she would fabricate a history that is either completely or partially false, or exaggerated – especially in light that her father is now deceased and her mother suffers from dementia and cannot corroborate this claim.
247. Although Elizabeth vociferously claims that I defamed her by bringing her narrative into question, she has not provided any evidence of this newfound disclosure – no police reports, hospital records or Children’s Aid social worker investigations to show that her family life had been “troubled”, much less to the point that she could suddenly represent herself as a “disenfranchised teen” at a time when I am actively sharing the story of how my troubled life as a disenfranchised teenager contributed to my radicalization. If anything, her comments in 20+ years of press interviews, and

her own website and articles, show that she was indeed a very “franchised” woman who enjoyed privileges and opportunities growing up that were inaccessible and/or denied to me.

248. I believe Elizabeth’s newfound status as a former “disenfranchised teen”, along with her persistent efforts to represent herself as a minor teenager rather than an adult woman at the time she joined the Heritage Front, is not only an appropriation of my lived experiences and personal history, but also an attempt to elicit sympathy and add mitigating factors to her story, because the idea of a privileged, middle class adult woman who suffered no beatings or abuse, and whose loving parents were supportive and paid for her entire education is not as palatable and marketable to an audience that seeks to understand why youth are drawn to extremist organizations.

#### **Elizabeth Moore’s Appropriation of my Public Speaker Role in the Heritage Front**

249. Across a span of twenty-four years, Elizabeth has claimed that her role in the Heritage Front was greater than it really was. Besides the fact that she was not an official spokesperson for the group, Elizabeth has repeatedly made the false assertion that she made speeches at Heritage Front meetings without producing any documentation to show that she was ever a speaker – which she was not. Elizabeth communicated this appropriative lie in her own words, and in interviews with journalists.
250. Since all HF meetings were recorded and videotaped, then sold to the public, and I was a featured speaker during at least three public meetings, the statement she makes in the following publications is easily disproved, blatantly false, and an appropriation of my lived experiences. It is noteworthy to point out that many of these statements precede the release of White Lies by 1-3 years, leading me to believe that Elizabeth misrepresented her experiences to the CBC when selling “her” story.

- a) The CAERS Tape, 1995 (Tape 19): *“I would visit members in jail. **I made speeches at meetings.** More or less if it was legal I did it at least once.”*
- b) “From Marches to Modems: A Report on Organized Hate in Metropolitan Toronto.” January 1997, edited by Bernie Farber. *““By the time I was ready to leave the group, I was “staff reporter” for Up Front, I ran a telephone hateline, and **I was a media spokesperson.** I put up flyers, **made speeches,** attended demos, **infiltrated left-wing organizations,** and public meetings including one when Bernie Farber [...] came to Queen’s.”* The bolded words represent lies and appropriations made by Moore.
- c) Thomson-Gale’s “Hate Crimes”, published in 2007 by Greenhaven Press, reprints Moore’s appropriative 1997 essay. On page 83: *“By the time I was ready to leave the group, I was “staff reporter” for Up Front, I ran a telephone hateline, and **I was a media spokesperson.** I put up flyers, **made speeches,** attended demos, **infiltrated left-wing organizations,** and public meetings including one when Bernie Farber [...] came to Queen’s.”* The bolded words represent lies and appropriations made by Moore.
- d) *“[Elizabeth Moore is] A woman who once ran a hate-filled, racist hotline **and made speeches** for Canada’s most successful neo-Nazi group”. [...] After high school she went to Queen’s University and engaged in neo-Nazi agitation: infiltrating anti-racist meetings, **speaking at Front rallies, putting up posters**” – “A Life Once Soured by Hate Finds Sweet Understanding”, by Adrian Humphreys, National Post, July 29, 1999.*

A copy of these statements is attached to this affidavit at Exhibit “HHH”.



### **Elizabeth Moore's Appropriation of my Four-Month Defection Process**

251. In the 1994 Vision TV documentary “It’s About Time”, I talk about how I spied on the Heritage Front for four months and turned over information to Martin Theriault of the Canadian Centre on Racism and Prejudice (CCRP). At first, Theriault was not sure that I was genuine so he asked me questions he would verify and fact-check, as well as gave me tasks to do. *“For months, Elisse spied on the Heritage Front; Martin double-checked the information she was handing over. It was a dangerous game.”* [...] *After four months of spying, Elisse had had enough.* (15:42-minute mark)
252. During my 1995 testimony in the House of Commons, I said: *“[Ruth] arranged the meeting and we met. Then we continued to meet and I gave them information. He checked it out. He figured I was indeed genuine, from the information I gave. I did that **for about four months**, until I finally left.”*
253. One year later, in CAERS Tape 19, Elizabeth tries to convey the same impression: *“I learned to trust Bernie Farber and he continued giving me advice. And it was slow, **it took me about 4 months** to get rid of the hotline, it was very painful for me to break up with my boyfriend, but I did that too.”*
254. Along with the admission at Tape 19 that she had watched my documentary on the night it aired, and that night she made the decision to leave the Heritage Front, Elizabeth sent me an email right after we met face-to-face for the first time in January 2013, where she tells me that she owns a VHS copy of my Vision TV documentary. I believe Elizabeth watched this documentary multiple times. Attached to this affidavit at Exhibit “III” is a copy of this email.

### **Elizabeth Moore's Appropriation of my 1993 Suicide Attempt**

255. My 1993 suicide attempt, which prompted me to reach out to Anti-Racist-Action activist Ruth Mackenzie and led to my eventual defection and testimony against Heritage Front leaders, first

became known to the press during my 1994 trial testimony as a witness in the Human Rights Commission case against the Heritage Front, Wolfgang Droege, Ken Barker and Gary Schipper. During cross-examination, when prompted to disclose what precipitated my actions, I talked about how I felt that I could not walk away from the Front and therefore believed that suicide was my only option. The story was picked up by several news outlets, including Toronto Sun's article "Ex-Racist's Despair", by Bill Dunphy, published on March 17, 1994.

256. Elizabeth was in the courthouse during the trial, where she took notes that she used in a vicious article she published in Up Front's August 1994 issue, titled "*The End of the Road for The Elisse?*". She had listened to my testimony and was familiar with the fact that I had attempted suicide.
257. After leaving the Heritage Front, Elizabeth wrote a letter to Queen's Journal in 1995 in which she appropriates my name and experiences: "Elisse Hategan attempted suicide, and I have come close to attempting on a couple of occasions". I am unaware of any medical records that indicate that Elizabeth had attempted suicide in that time, and therefore I believe this is yet another instance of Elizabeth helping herself to my lived experiences and using my name to conflate our lives and identities. I also believe that Elizabeth used my suicide attempt as creative fodder for her White Lies consulting gig and the creation of a secondary, used-up character named Erina who hangs herself. Attached to this affidavit at exhibit "JJJ" is a copy of Elizabeth's letter to Queen's Journal.

### **Elizabeth Moore's Appropriation of my Work for Ernst Zundel**

258. On Aug.6, 2017, the day following Ernst Zundel's death in Germany, Elizabeth started to claim that she had worked at Zundel's house (a convenient claim to make after Zundel is dead and cannot corroborate this) by tweeting: "I knew #ErnstZundel and worked at his house briefly." She then made attempts to contact Sylvia Nowak, a filmmaker friend of mine who was in the process of

making a documentary about Ernst Zundel's house at 206 Carlton. Elizabeth privately messaged Nowak on Twitter, saying that she knew Zundel and "I spent some time there in the early 90s, before defecting from the neo-Nazi movement in 1995." (Twitter, 2017/08/07). This claim is entirely false. I worked for and associated with Zundel until mid-1993 and never saw Elizabeth in Toronto. Elizabeth had not met any Heritage Front members in person before our telephone call in late August/early September 1993. By September 1993, Elizabeth was living in Kingston and attending Queens, thus being unable to "work" for Zundel.

259. In our first meeting at Big Sushi restaurant in 2013, when we were sharing stories about people we knew "back then", Elizabeth had told me that she had only been in Zundel's house "a couple of times" and she didn't like him because "he creeped her out." I believe that Elizabeth only met Ernst Zundel during the filming of *Hearts of Hate* in the fall of 1994. During the filmed scene at the Parliament Street restaurant, everyone in attendance – with the exception of Zundel's right-hand man Jurgen Newmann – were not people I had ever seen visit Zundel's home during my 2 years of on-and-off work for Zundel. I believe the Heritage Front and Zundel staged the get-together as a "photo-op" because none of these individuals, except for Jurgen, were Ernst Zundel's associates.
260. In a Toronto Sun article dated March 25, 2003, Elizabeth deceitfully appropriated my experiences with working with Zundel as told in my interviews with the Toronto Sun, the Canadian Jewish Congress, trial testimony and my testimony in the House of Commons a decade earlier. "In the early '90s, Moore – a teenager – did everything from stuff envelopes with anti-Jewish literature to unpack boxes of books in Zundel's home. She blindly accepted Zundel's warped view of history, rather than find out for herself, noting: "I believed what he said, instead of researching the truth." I believe Elizabeth learned the details of my work with Zundel after attending the trial where I testified

against Wolfgang Droege and two other core HF members, and after studying interviews where I discussed my experiences.

261. On Feb 15, 2018, Elizabeth tweeted: “I went by one of my old haunts this morning. It’s always odd seeing a place that was such a flashpoint in Toronto’s history be so ordinary now. However, clues to its past remain. (Bonus points if you recognize it!)” The tweet is accompanied by several photos of 206 Carlton Street that are nearly identical to 2013 photos I took of Zundel’s property for my September 29, 2013 post on Anti-Racist Canada titled “**Old Haunts of the Heritage Front**”, and which I posted on my Facebook page. I believe that her tweet is deceptively worded and intended to convey that she was a regular at the Zundel household, which is false and an appropriation of my lived experiences. Attached to this affidavit at Exhibit “KKK” is a copy of Elizabeth’s tweets.

#### **Elizabeth Moore’s Appropriation of my Religion**

262. I converted to Judaism in 2013, when Elizabeth and I were friends. She confessed that she too was planning to use the Hebrew name I chose for myself, and that she too wanted to receive a menorah as a conversion gift. On January 21, 2015 myself and my partner were invited to Elizabeth and her husband’s new house. That evening Elizabeth informed me that she had changed her mind and no longer wanted to convert to Judaism, primarily because she didn’t want to learn Hebrew and the process seemed too difficult – also, her husband was not religious and had not even had a bar mitzvah. Elizabeth had pulled out all her Jewish-themed books – approx. 20 of them – and asked me to take what I wanted, telling me that she planned to sell them at a used bookstore. I took nearly all her books and gave her \$40 since I felt bad about taking them for free. She did not seem interested in Judaism at all anymore, and appeared content with her decision.

263. After I announced my speaking engagements for Jewish organizations in 2017, Moore's new Twitter account @onemooreliz followed most of the reporters, criminology and Jewish organizations I was already connected with. Soon she would start retweeting Jewish persons and organizations, and posting photos and comments about her involvement with the Canadian Jewish Congress. Over the 2-year period between January 2017 and December 2018, I noted what I believe is a deliberate and methodical appropriation of my Jewish identity, through the conveyance of a public impression that Elizabeth is an observant Jew.
264. In this time, Elizabeth had posted multiple tweets and messages intended to convey the impression that she is Jewish. Examples consist of her posting Hebrew greetings and Jewish messages for Jewish holidays only, and by omitting the mention of Christmas or other religious holidays, even though she is of a Christian/Anglican background. Once litigation commenced she started publishing more Christianity-related posts, but between 2017-2018 she has zero posts about Christianity or any other holidays except Jewish ones - no non-Jewish holidays mentioned in 2018. Attached to this affidavit as Exhibit "LLL" is a list of Elizabeth's Jewish-related posts.
265. Since the inception of Elizabeth's @onemooreliz Twitter account, she has followed the bulk of my Jewish media / press contacts on Twitter, as well as people I know through my synagogue and personal social circles, such as filmmaker Sylvia Nowak, my fellow synagogue congregant Nick Lunz, and my Salaam-Shalom sister and rabbinical student Devon Spier. She also followed my synagogue's social media account.
266. In October or November 2018, Moore met with Andrew Gregg, a Toronto documentary filmmaker and discussed the potential of appearing in a new documentary. According to Gregg, during their meeting Elizabeth stated that she lives in a "Jewish household" and that she intends to convert to Judaism, and that the conversion "would probably happen next year". I believe that Elizabeth was

lying to Gregg because of 1) her firm 2015 decision to get rid of all her Jewish conversion-themed books, and 2) because she declared in the 2017 Ottawa Citizen article that she had “decided against” converting to Judaism. A copy of this email is attached to this affidavit at Exhibit “MMM”.

267. At paragraph 51, Elizabeth claims she was “appalled” when she read my Statement of Claim, and that she felt my truthful comment that she is not a Jew was “belittling and demeaning”. The fact of the matter is that in Judaism, you are not considered Jewish unless you are born of a Jewish mother or undergo the formal process of conversion. Exceptions have been made for people born of a Jewish father and raised in Jewish households, neither of which applies to Elizabeth.

268. Elizabeth might believe that because she married a secular Jewish man and occasionally engages in interfaith celebrations, it means she can skip over the formality of conversion; however, me stating the widely-recognized fact that halachically she is not Jewish is not defamatory because Elizabeth Moore is NOT a Jew. My partner is of mixed Afro-Caribbean and Jewish heritage. Although we live in a multi-ethnic household, I would not call myself Black or consider it malicious, defamatory, belittling and demeaning if someone else corrected me and affirmed that I, indeed, am not Black. Nor would my partner call herself Jewish (although she has Jewish ancestry) because I am a Jew.

**Elizabeth Moore’s appropriation of my queer identity and involvement in LGBT community**

269. On January 10, 2018 I announced that my autobiographical story “Turned” was published in Issue 2 of LSTW Magazine, a publication for lesbian and queer women. Also in January 2018, EGALÉ Canada put out a call for speaker proposals on Jan 30 and soon after I was accepted as a speaker at their National Conference (May 23-25, 2018).

270. Around this time, Elizabeth Moore decided to “come out of the closet”. In a tweet from March 10, 2018, Moore wrote: “During my keynote at the AG Hate Crimes Training Conference I spoke about how my bisexuality factors into my story for the first time.” In May 2018, she writes “And to think, I owe my status as a happy and publicly visible bi person to a hater who maliciously outed me. I don’t think it went the way they planned. Haha! #BiPride #BiVisibility #bisexual”
271. Moore credits her new status to her “hater” – I believe she is referring to me because I wrote in a 2015 blog post that I believed she was obsessed with me due to the fact that after I came out in NOW magazine in 1994, at age 19, Elizabeth temporarily thought she was gay too. In an email she sent me on January 18, 2013, Elizabeth writes, “For a long time after I left the movement, I thought I was gay. I spent a lot of time on Church Street, trying to come to terms with everything.” Yet, in my two-year friendship with Elizabeth, I never heard her discuss any relationships with women.
272. I believe Elizabeth’s LGBT-related tweets and her sudden decision to come out as bisexual were sparked by my increased activity and engagement in the LGBTQ community, and the creation of my non-profit organization Changemaker Arts Project, which is trying to generate opportunities for LGBTQ youth and disadvantaged LGBTQ persons.
273. Elizabeth’s appropriation of my queer identity exposed me to severe vitriol and harassment due to series of tweets and a Medium article she posted in May 2018. At that exact time I was attending a two-day EGALE National Conference as a speaker and had no idea why I was being attacked on Twitter, until I realized that Twitter users had me mixed up with Elizabeth Moore. In her tweets, Elizabeth decided to use the hashtag of the Santa Fe shooting to falsely claim that her bisexuality was a factor in her joining the Heritage Front (the first time in 20 years she incorporated this claim into her narrative). This claim caused enormous backlash. Tens of thousands of Twitter and

Medium users called her out, stating the comments homophobic and/or biphobic. A copy of Elizabeth's tweets and resulting backlash are attached to this affidavit at Exhibit "NNN".

274. After Elizabeth deleted her tweets and Medium article, many outraged people still believed I was the author and attacked me for being "homophobic". Although I made every effort to point out that I was *not* the author of those misinformed tweets, some continued to believe it. Damage was done to my brand and reputation due to the Elizabeth's appropriation and the recklessness she showed in making comments that provoked significant backlash - over a hundred thousand Twitter users expressed outrage at her statements via likes, retweets and negative feedback.
275. This negative backlash against me was entirely due to Elizabeth's attempts to hijack a hashtag about a shooting in order to pass as queer and gain foothold in the LGBT community, particularly during a time when I was attending an LGBT conference and being announced by EGALÉ as a featured speaker. After two decades of intentional appropriation of elements of my life and my identity, Moore's story is now being perceived as nearly synonymous, or so close to mine that many people cannot tell our stories apart.

### **Elizabeth Moore's Jealousy and Expressed Animosity**

276. Elizabeth attended during my March 1994 testimony against Wolfgang Droege and two other high-profile Heritage Front members and took notes of my testimony, which culminated in an article about me that was published in the August 1994 issue of Up Front magazine. Elizabeth's article, titled "*The End of the Road for The Elisse*", is full of falsehoods, vitriol and animosity directed at me and intended to incite hate and contempt toward me because I testified against 3 neo-Nazis. She also appears to express jealousy of me by gloating that I would no longer be "in the limelight." The



typical readers and/or subscribers to Up Front consisted of white supremacists and neo-Nazis, some with criminal records for violent assaults.

277. In my view, Elizabeth's piece is clearly intended to inflame and incite negative opinions of me, which may have led to violence against me if I was not already living in hiding. This is a particularly important point to note, given Elizabeth's false allegations in paragraphs 89 and 90 of her affidavit, where she maliciously claims that the mere act of me simply speaking out about my lawsuit may lead to violence against her.
278. Just as she did in 1994, Elizabeth's false affidavit allegations are calculated to injure my reputation. Elizabeth incited contempt toward me in her Up Front article for testifying against 3 neo-Nazis, an act that contributed to shutting down the Heritage Front, and falsely alleged since 2017 that she herself had contributed to shutting down the group. In her Up Front article, Elizabeth makes the false allegation that my decision to testify against the Heritage Front was due to a backroom deal, and mocks my immigrant status by calling me a "wretched little immigrant girl". She also mocks my sexual orientation and that of my friends', who she calls "a couple of renowned dykes."
279. Based on the vitriol aimed at me in her article, I believe Elizabeth was jealous of my position in the Heritage Front and close relationship with its leaders and core group. Given her repeated references to me being a "star", who enjoyed "glory days" in "the spotlight", in "the limelight", of "media attention" and the "accolades of an adoring public" and gloating that I was now "stripped of stardom", Elizabeth appears to:
- a) Acknowledge my unique position as the Heritage Front's female face (a part of my unique experience and identity that she later appropriated and incorporated into her false narrative, as seen in the 2017 Ottawa Citizen article), and

- b) Express resentment at the attention I received from the Heritage Front and the press.

Throughout the article, Elizabeth appears to be preoccupied with the publicity she believes I received as a prominent Front member, and after defecting from the Front. As a fringe member for the year she was actively involved with the HF, Elizabeth did not have a prominent status in the group and in the media.

280. When Elizabeth contacted me in 2013, I had not read her article. After defecting from the Heritage Front in 1993, I tried to move as far as I could from that troubled time in my life, both literally and figuratively, and this included not keeping track of what they were saying about me. While living in hiding, I was periodically informed by Martin Theriault that the Heritage Front was spreading contempt and hate toward me, and advised not to read any of it due to my mindset at the time (I was experiencing post-traumatic stress, fear, anxiety and depression).

281. In July 2019, as I was researching historical archives in preparation for my lawsuit and went through all archived issues of Up Front that I could find to see what Elizabeth's contribution (if any) had been to the magazine, I discovered the article. If, back in 2013, I had known what she had written about me, I would never have engaged in communication, much less a friendship, with Elizabeth. I believe this article establishes that Elizabeth's obsession with me and her jealousy of me were evident while she was a member of the Heritage Front. I also believe this jealousy and obsession informed Elizabeth's calculated decision to appropriate significant aspects of my life experiences and identity in order to gain media attention, the White Lies movie deal, and to beef up her low-profile, relatively insignificant experience with the group.

282. I believe that Elizabeth felt entitled to ridicule and disparage me by describing me as a "wretched little immigrant girl", and then proceeded to help herself by stealing elements of my life, because a

“wretched little immigrant girl” with no prospects, no education that she was aware of and no connections to influencers like Bernie Farber had no chance of fighting back against a Canadian-born, educated, middle-class woman like herself, and she thought that she could get away with it.

283. I believe Elizabeth is jealous of me and resents the media attention that I received after I defected from the Heritage Front, testified against its leader and core members, and helped to shut down the group. Her 1994 article in Up Front about me, where she incites contempt against me for providing information to police and testifying against group leaders, reflects what I believe is an undue preoccupation and fixation with me having received media attention. I believe that this jealousy is behind Elizabeth’s decision to first start appropriating elements of my story, as early as 1995, even before she started to receive financial and material benefits from this behaviour. I believe that Elizabeth resorted to appropriating my lived experiences because:

- a) she did not do anything whatsoever to shut down the group and didn’t have a marketable story, but she wanted the same amount of media attention that she believed I was receiving.
- b) because she was not in the confidence of group leaders at the very least because of Elizabeth’s remote location (living in Kingston rather than Toronto) and the fact that, as she readily admits, the HF leadership “didn’t want to trust another girl with sensitive info” and she was “kept far from the eye of the storm” - whereby her fringe status prevented her from obtaining the kind of information that might be useful to police or the Courts.

284. I believe that Elizabeth’s jealousy has led to her repeatedly modifying her story over the years to eliminate the obvious lies (such as her initial claim that she had made speeches at HF rallies - which is very easy to prove or disprove due to every HF meeting being videotaped), and to further narrow in on elements of my life she felt would be more appealing to journalists - such as falsely portraying

herself as having been a younger age, having been a “disenfranchised teen”, and joining Farber in making the false claim that she shut down the organization on The Agenda.

285. I worked hard to develop a brand and following as an author. I spent thousands of hours in conversations with readers, fans, and people who remembered me from the 1990s and wanted to read my book and/or engage in conversations with me about that time. I also spent thousands of dollars in promotional material and advertising. I believe that Elizabeth wanted to take the easy road and simply rely on her connection with Bernie Farber for all her promotional activity; and when in 2018 she did build a website under the name “Elizabeth Moore”, she took shortcuts by once again appropriating my story - a unique story that I not only lived, but spent several years writing a book about, and thousands of dollars to promote - and to this date is using it to market herself.

**The Cost of Elizabeth Moore’s Appropriation of my Lived Experiences**

286. I believe that Elizabeth Moore’s dissemination of lies and appropriations has caused me irreparable harm. I do not know how many work opportunities I have lost out on because of Elizabeth’s appropriations of my lived experiences and personal history, or how much she has earned over the past twenty-four years, or from any royalties she has gained from the films *White Lies*, *Choose Your Voice*, or any other projects. Between 1995 – 2019, Moore has appropriated my lived experiences on at least 7 public platforms that reached millions of people across North America.

- a) Print (newspaper articles)
- b) Television and public film screenings (also sales of VHS and DVDs)
- c) Radio and podcast interviews
- d) Speaking engagements where she repeated the assertion that *White Lies* was based on her life. Speaking gigs that were gained through fraudulent misrepresentation – using appropriations to market herself to crowds of adults and high school students.
- e) Educational programs implemented nationally across school boards

- f) Social media (Twitter, Facebook, Reddit and potentially other platforms)
- g) Elizabeth's own website

287. Not only has Elizabeth methodically appropriated multiple elements of my life story, but I believe she is using the courts in the same way she used police in 2016 – to intimidate and silence me from speaking publicly about how she stole major elements of my life, conflated it with her own, and monetized it because she didn't have a marketable story of her own. I believe that Elizabeth is guilty of fraudulently misrepresenting herself to the media and public across two decades, and that she is actively seeking to deprive me of further opportunities to earn an income by slandering and defaming me to my friends, colleagues and criminology professors such as Barbara Perry.

#### **Bernie Farber's Negligence and Endorsement of a Fraudulent Narrative**

288. For twenty-four years, Elizabeth Moore was able to represent herself as someone she was not, and incorporated my lived experiences into her inconsistent and deceptive narrative, coasting chiefly on the endorsement of Bernie Farber and his reputation as Director of the Canadian Jewish Congress. Because Farber, a widely-recognized community influencer frequently quoted in the press, had paraded her in front of crowds and endorsed her at speaking engagements, nobody questioned or felt the need to authenticate her false or exaggerated claims.

289. Both Moore and Farber are complicit in the creation and dissemination of a fraudulent narrative that took significant elements of my lived experiences and attributed them to Elizabeth. As a result of this deliberate exploitation of my lived experiences, I suffered incalculable financial loss and emotional distress while both Farber and Moore profited commercially through film projects, media publicity and speaking engagements.

290. Farber had a moral and ethical duty to the Jewish community he purportedly represented to verify and authenticate all of Elizabeth's claims, but his actions show that he did not. As Directors of the Canadian Jewish Congress, both Farber and Rudner had a fiduciary duty to their organizations, as well as to the investors and donors of the Choose Your Voice campaign, to ensure that the material which was taught to over half a million schoolchildren in Ontario was free of falsehoods, fraudulent "experts" or fake stories. The fact that Rudner selected Elizabeth as a participant in this high-profile project simply because he "had her number" at the same time he was involved in a sexual relationship with her, does not indicate to me that either Farber or Rudner did their due diligence.
291. I believe that Farber did not follow any protocol for due diligence and did not comprehensively fact-check Elizabeth's inconsistent and fraudulent narrative because doing so would place him at odds with his desire to profit from the media attention generated by both Hearts of Hate, and White Lies.
292. Since the creation of the Canadian Anti-Hate Network in 2018, Farber has endorsed and promoted Elizabeth with the full knowledge of my allegations, and even after litigation was commenced. At no time did Farber demonstrate or express any interest in reviewing my verifiable evidence of Elizabeth's inconsistencies and lies. At no point did he consider that Elizabeth's intimate involvement with his friend Len Rudner, who is now also part of the Can Anti-Hate Network, might present a conflict of interest before appointing Elizabeth as an Advisory Board member and promoting her as an expert and educator in the community. In fact, while on Kinsella's podcast on January 25, 2019, Farber promoted Elizabeth's false narrative and immediately solicited public donations to an organization he created, and from which he earns an income. In sum, he solicited moneys from the Canadian public while endorsing a fraud.
293. I do not believe that Bernie Farber's initial involvement with Elizabeth was malicious or intended to exploit my story or promote a fraud. I believe that when he started promoting and endorsing

Elizabeth and her false narrative to the press and community, he earnestly wanted to show how the Heritage Front manipulates vulnerable young people into spreading its hateful message. However, in his desire to swiftly make this happen, he skipped over details that would have made it abundantly clear that Elizabeth was lying about the extent of her involvement with the Heritage Front, and that she had grossly exaggerated her contributions and value to the group.

294. Once Bernie was personally invested in Elizabeth's narrative, he too began to profit in attention, publicity and speaking engagements related to her false account. He participated in media interviews, public panels and speaking events alongside Elizabeth and Peter Raymont, Hearts of Hate's director. He was featured in the same 1995 Macleans article that led to Elizabeth's White Lies movie deal. I believe that once Bernie started materially benefitting from Elizabeth's deception, it was no longer in his best interest to scrutinize her ever-changing, inconsistent narrative. He had staked his personal and professional reputation on a liar, and he would risk negative attention if Elizabeth's fraudulent narrative was exposed.
295. At paragraph 11 of his Statement of Defence, Bernie Farber denies that he had any responsibility or duty of care toward me, and that there was no standard or breach of such care in his actions. However, I believe that as the former Director of the Canadian Jewish Congress and the Executive Director of the Mosaic Institute at the time "The Agenda with Steve Paikin" was taped, Bernie had a moral, ethical and fiduciary duty and responsibility to ensure that his position would not be leveraged and used to promote fraud in the community – a community that I am a part of. He neglected his duty and spoke on behalf of the Mosaic Institute and in his capacity as former CJC Director when he endorsed Moore's false claims and committed the tort of appropriation by using – without my consent – both my name and my courageous actions as a teenager, in an effort to

endorse and monetize Elizabeth Moore's false narrative, a narrative that they both profited commercially from since 1995.

296. Farber was also the editor of the January 1997 "*From Marches to Modems: A Report on Organized Hate in Metro Toronto*" report, commissioned by the Access and Equity Centre at the Municipality of Metropolitan Toronto, which featured an essay written by Elizabeth which contains several appropriations of my lived experiences. Elizabeth recycled the content and submitted the same essay for publication in multiple textbooks, such as Thomson-Gale's "Hate Crimes", published in 2007 by Greenhaven Press. As editor of a report paid with City of Toronto public funds, it was Farber's duty and responsibility to do due diligence and ensure that Elizabeth's contribution was fact-checked and free of falsehoods and/or appropriations.

297. On multiple occasions since 1995 and up to 2019, both in written documents and via public engagements and television interviews, Bernie Farber has facilitated and was instrumental in distributing Elizabeth Moore's false narrative to the public – a narrative that they both profited commercially from. These falsehoods consist of Moore's appropriations of my verifiable, lived experiences as accounted both in 1990s newsreel footage, press, and Heritage Front videotapes and magazine coverage, which she herself did not experience, such as:

- a) The false claim that she was a media spokesperson
- b) The false claim that she made speeches at meetings/rallies
- c) The false claim that she infiltrated left-wing organizations and attended demonstrations
- d) The false claim that she contributed to taking down the Heritage Front

Attached to this affidavit at Exhibit "OOO" are Farber's tweets and recent promotions of Moore.



298. I believe that Farber has invested his reputation into Moore's lies since 1995, and he cannot extricate himself easily from a lie that spun out of control and became a full-fledged exploitation and monetization of my lived experiences. But when he went on The Agenda in 2017, he had a choice to tell the truth – and yet lied again for Elizabeth. I believe that misrepresenting my experiences as hers is a financial and publicity opportunity for the Canadian Anti-Hate Network and Farber himself to claim that he rescued “the pretty, public face” of the Heritage Front.
299. I do not believe that Elizabeth could have gotten away with this deception for 20+ years were it not for Farber’s repeated endorsement, and his use of the Canadian Jewish Congress’ good name and brand to promote and endorse a fraud. I believe that his dislike of me, which I feel stems from his admitted friendship with Grant Bristow and the fact that I impolitely asked him if he too had slept with Elizabeth, have created a situation where he cannot see the forest through the trees.

**Bernie Farber’s Friendship and Relationship with CSIS informant Grant Bristow**

300. I believe Farber is covering for, and endorsing, Elizabeth’s appropriations of my experiences in the Heritage Front for the following reasons:
- a) As a way to boost his own profile and generate media publicity for himself as someone who has heroically helped to disengage far-right extremists
  - b) As a way to reward someone who – along with himself - has participated in collusion and the monetization of a lie (the film White Lies, which was attributed to Moore)
  - c) As a way to ensure the silence of someone who has evidence that could “destroy” the reputation of the now-defunct Canadian Jewish Congress and its directors
  - d) His dislike of me and his admitted friendship with Grant Bristow

301. In an April 9, 2017 Toronto Star article about Grant Bristow, Farber admits that he has “stayed in touch” with Bristow since 2004, and that he “considers Bristow a friend”. Despite all the accounts of anti-racist activists who were harassed, terrorized and harmed as a result of Bristow’s actions, many of them females, and despite having learned that Bristow encouraged me to break the law and partake in the harassment campaign while I was still a minor, Farber insists that Bristow is “a man who wanted to do something real good for his country.” Attached to this affidavit at Exhibit “PPP” is a copy of Farber’s admitted friendship with Bristow, as detailed in Jennifer Yang’s 2017 article.
302. Bernie Farber is under the mistaken belief that Bristow saved his life, which is false. There is no evidence that Bristow averted any threats to Farber, much less provided evidence of an assassination plot. I believe that the idea of an “averted plot” was concocted by Bristow and possibly his handler as a way to neutralize outrage from the Jewish community after he was outed as the founding father and co-leader of the Heritage Front who had led neo-Nazi skinheads on a terror campaign against innocent people. No charges were ever brought against any Heritage Front members over this non-existent plot, which was conveniently disclosed by CSIS while SIRC was investigating allegations that Bristow had actually incited criminal activity, rather than averted it.
303. A significant number of my 1993 affidavits discuss illegal activities committed or counselled by Grant Bristow, including the vicious harassment and terror campaign directed at anti-racist activists and members of Toronto’s Indigenous community. Operation Governor was dismantled after reporter Bill Dunphy exposed Bristow’s significant role, and Bristow was questioned by Metro Police as a result of my affidavits. Also as a result of me questioning the whitewashing of the SIRC report, a second investigation had been launched. In 1994, I testified in the House of Commons about what I witnessed Bristow do, and how he had counseled me and others to commit illegal acts.

304. In the 5 years that Bristow had been an agent provocateur inside the Heritage Front, not a single Canadian white supremacist or neo-Nazi was ever charged and convicted of a crime. My testimony against Wolfgang Droege and the 2 other Front leaders put them behind bars, and my affidavits brought to light illegal activity on the part of Heritage Front members, Bristow included.
305. As a result of my affidavits, Toronto Metropolitan Police questioned Bristow in an attempt to launch an investigation into his criminal activities. CSIS provided him with a lawyer and subsequently relocated him to Alberta as part of the Witness Protection Program, thereby ending Toronto police's investigations into his crimes. My defection from the Heritage Front led to a criminal investigation into Bristow's activities, as well as public hearings into his inflammatory role within the HF. Both Bristow and Bernie Farber, who calls Bristow "a friend", have significant reasons to dislike me and wish to erase my contribution to the collapse of the Heritage Front.

**Elizabeth Moore and Bernie Farber's Relationship with Warren Kinsella and Daisy Group**

306. I first became connected to Warren Kinsella on social media platforms Twitter and Facebook in 2015. At the time we were cordial and he remembered me from my Heritage Front days. On occasion, we "liked" or retweeted posts we respectively made on Facebook or Twitter. A year later I also followed his wife Lisa on Twitter, and she followed me back. Kinsella also linked to and reposted at least one of my entries from my Incognito Press blog to his Warren Kinsella website. In that time, we had no disagreements or exchanged any kind of negative comments. I treated him with respect, and thought he respected me also.
307. Everything changed on September 11, 2017 – the night when The Agenda with Steve Paikin aired their interview with Bernie Farber and Elizabeth Moore. Distressed at the unauthorized appropriation of both my name and my contribution to shutting down the Heritage Front, I posted

the following tweet on Twitter on September 9, 2017: *“For the last 2 yrs I was stalked by Elizabeth Moore, who used relationships with @Lenrudner & @berniefarber to impersonate my life @spaikin”*. My tweet included screenshots from the email correspondence I had with Len Rudner the previous year, in which he had admitted to his affair with Elizabeth.

308. Following this tweet, I received fast and vicious backlash from Warren Kinsella. Within hours of my tweet, he had posted a defamatory tweet about me and my credibility, and subsequently blocked me from both Facebook and Twitter. He also retweeted my tweet with the caption: *“Hey, everyone, @BernieFarber & @LenRudner would do no such thing. It’s bullshit. This person should not be taken seriously any longer. Bye.”*
309. Kinsella never attempted to ask me what I was talking about, or asked to examine my evidence. Instead, he engaged in a concerted effort to smear my reputation on social media. Given that he is owner of a well-known PR firm, Daisy Group, I believe this was a speedy PR move to smear me and salvage Farber and Rudner’s reputations. I never communicated with Kinsella after he blocked me and didn’t anticipate that his vicious smear campaign against me would continue. But it did.
310. In April 2018 I recorded a one-hour radio show with Canadaland Commons. After hearing the interview, Canadaland journalist Jesse Brown tweeted: *“This week’s @CANADALANDCMNS is fascinating. The story of CSIS & The Heritage Front is boggling. The parallels to hate groups today. All told by someone who lived it...and who has insight about it. Could be a movie.”* Kinsella responded to Jesse Brown with this tweet: *“Trust me: you guys should really, really not sing the praises of her. DM if you want background.”*
311. I became aware of Kinsella’s tweet after a Canadaland reporter privately messaged me on Twitter to ask why Kinsella would make such a statement about me. At that point, I experienced significant

distress and panic due to the fact that someone with Kinsella's reputation and media connections would so overtly smear me – and invite others to communicate with him in private about me. His invitation to Jesse Brown and others (i.e. “you guys”) at Canadaland to DM (Direct-Message) him indicated to me that he had something negative and/or defamatory to communicate about me but wanted to do it privately, away from scrutiny and the threat of litigation.

312. Given that I had done nothing to give Kinsella any reason to feel any hostility toward me, I assumed that his attempts to destroy my reputation had to do with Len Rudner and Bernie Farber (Farber's “brother from another mother”). I felt so intimidated and scared by Kinsella's overt hostility toward me that I did not ask him to take down the tweet. I did not communicate with Kinsella and made no negative references to this second defamatory tweet. As upset as I was at having my reputation smeared with Canadaland employees and Kinsella's significant Twitter audience, I chose to dismiss it because I was afraid it would provoke more hostility from Kinsella.
313. On November 1st, 2018, Maclean's Magazine published my editorial “Online hate is an infectious virus—and it should be addressed like real-life violence.” The article compared the dangers of online hate to an infectious virus, and made absolutely no reference to Kinsella, Farber or Moore. However, once again I discovered that Kinsella attacked me with defamatory and untrue allegations about my character. After one of his Twitter followers sent him the link and asked if he had read the article, Kinsella responded: “I won't read it. She threatens people online and @macleans shouldn't be giving her a platform.”
314. For the second time in a year, Warren Kinsella made direct appeals to a mainstream media network to not give me a platform. By stating I “threatened people” (using the plural tense), he once again tried to smear my reputation while appealing to the press – in this case, tweeting to Maclean's Magazine – to blacklist me from publication. I had no idea what he was talking about since I have

not threatened anybody online, much less multiple people. I feel devastated that, without any provocation or wrongdoing on my part, Warren Kinsella had engaged in a systematic smear campaign against me every time I was published in a prominent mainstream magazine or recorded in a mainstream interview. Attached to this affidavit at Exhibit “QQQ” are copies of Kinsella’s defamatory tweets.

315. To date, Warren Kinsella has never attempted to address his open hostility toward me, or state why he believes I do not deserve a platform or should not be published as a freelance journalist. I view Kinsella’s actions as libelous, defamatory, and severely damaging to my reputation and my struggling attempts to make a living as a freelance writer. Moreover, I question why Kinsella appears so invested in shutting down my voice, destroying my credibility, and preventing me from publishing articles or being interviewed by news networks.
316. The close relationship between Warren Kinsella, Bernie Farber and Elizabeth Moore cannot be understated. Kinsella is close friends with Bernie Farber, and on several occasions they have both referred to each other as a “brother from another mother.” Warren Kinsella has 35K followers on Twitter and his name is widely-recognized in Canada. I am shocked and disturbed that, beginning on the evening I tweeted about the collusion between Farber and Moore, Kinsella set out to use his sizeable platform to call on Macleans and Canadaland to prevent me from publication and airtime.
317. In June 2019, Elizabeth had professional photos taken of herself posted on her social media accounts, crediting Daisy Group employee Tom Henheffer as the photographer. Henheffer is currently listed as a team member Daisy Group. I do not know whether Moore has hired Daisy Group as a PR firm or solicited their assistance “off the books”, but her relationship with both Kinsella and Henheffer suggests that she may be a client or benefited from their PR services. I am extremely concerned that such a move may be behind Kinsella’s defamatory tweets, since I believe

that Kinsella has earned a reputation for strong-armed tactics that target his clients' opponents.

Attached to this affidavit at Exhibit "RRR" are copies of Moore's and Farber's social media posts indicative of a close relationship between themselves and Kinsella / Daisy Group.

318. Farber and Moore's friendship with Warren Kinsella, who has a sizeable platform and an established PR firm, has resulted in false and disparaging remarks made about me that were directed specifically at news media organizations that gave me the opportunity to publish and get paid on their platform (Macleans Magazine) or interviewed me, as was the case with Canadaland. I believe that these remarks, made by a friend of both Defendants who also owns a PR company, are calculated to impede my future opportunities to be interviewed by or write for Macleans Magazine and Canadaland, and other publications. I also believe that Kinsella's involvement, particularly in light of the January 25, 2019 podcast in which he misattributed "shutting down the Heritage Front" to Elizabeth Moore, is evidence of a conspiracy on the part of both Defendants to continue disseminating a false narrative that both undervalues my contributions to fighting hate in Canada by shutting down the Heritage Front, and falsely attributes to Elizabeth Moore verifiable, unique events that happened to me.

#### **Elizabeth Moore and Bernie Farber's Relationship with Anti-Racist Canada (ARCCollective)**

319. In 2011 I first became connected with the Anti-Racist Canada (ARC) website, operated at <http://anti-racistcanada.blogspot.com/>, by leaving a comment under a blog post. Soon I started a correspondence with the owner and operator of the website and Twitter account, Kurt Phillips, who operated under the anonymity of the ARC moniker. As soon as he saw my name, Kurt recognized me from my Heritage Front days. In an email dated June 19, 2012, he writes:

*“When you first left that comment on the blog, I was excited because when I started studying and researching organized racism, you were a name I was well intimately familiar with.*

***You, more than anyone else, took down one of the nastiest hate groups that had existed in Canada in years.** And you did this by rejecting a group that you had been an active member of. You proved that people can change and do good. So, I admit, when you first contacted us I had a bit of a "fan boy" moment.*

*But as I learned more about you and how you struggled in the years between the mid 1990s and when you contacted us, I think my respect for you grew even more. You did the right thing knowing that it would put a mark on you and you did this with no help at all from the government. At the same time Bristow was being given another identity, home, and a monthly paycheque, you were simply trying to make ends meet. You were given no advantages at all, and yet you did remarkable things. You received your high school diploma and was accepted to university graduating with honours. You've travelled and experienced life in ways most people have never dreamed of. You've found love and made a life for yourself.*

*If you had just curled up into a ball and given up, I might not have blamed you. You were dealt a stacked deck. But you didn't give up. You never allowed any of the bastards to beat you.”*

320. In my 4 years of friendship with Kurt Phillips and as part of the ARC Collective, I supplied information (such as names and photos of Heritage Front members), took photos and wrote several blog pieces that were posted on the ARC blog. I supported the website and Kurt's sleuthing activities by providing opinions and verbal/written support whenever necessary. We advised and confided in each other on numerous occasions, both via email, telephone and in person, and had conversations that reached far beyond the topic of racism and white supremacy. Kurt also sent me gifts and care packages on multiple occasions, I sent him one package in return, and he contributed financially to my book fundraising efforts.
321. My first post on Anti-Racist Canada appeared in November 2011. At that time, Kurt wrote, in an email dated November 21, 2011, that my material would be left permanently on the website: *“We also posted the link to your blog entry on Bristow (as well as your coming out post). **The information to purchase your book is found at the top and we are going to create a link on the side so that it will be available permanently on the front page.**”*



322. Over the following months, Kurt and I became close friends. We started chatting over the phone, and at one point in 2013 he visited me in Toronto. Kurt became my best friend and someone I confided in frequently, including sharing my doubts and concerns about Elizabeth Moore's appropriation of my lived experiences. As an expert in the field of anti-racism in Canada and someone regularly relied on by reporters who cover stories about neo-fascism in Canada such as Evan Balgord, Kurt was intimately familiar with most of the central characters involved in the Heritage Front and was aware of the limited role (if any) that Elizabeth had played in the group.
323. Kurt knew about my friendship with Elizabeth and as a Facebook friend of mine, he witnessed my social interactions with her. At one point I tried to connect them, but Elizabeth was not interested in having anything to do with Anti-Racist Canada and did not want to share whatever personal mementos she still had of her time inside the Heritage Front. Right after my meeting with Elizabeth at the Madison Pub, where she shared details of her affair with Len Rudner, and right after I watched White Lies on YouTube, I reached out to Kurt and told him of my concerns that Elizabeth may have used her intimate relationships within the CJC to advance her career, including brokering a CBC film that clearly represented a majority of my lived experiences, and not hers.
324. In a Facebook DM correspondence dated February 21, 2015, Kurt indicates the following about Elizabeth Moore: *"It had been decades since she was involved with the HF and even then **wasn't a significant personality. [...] She didn't do anything to actually endanger herself other than just leave and go on a speaking tour**".* Attached to this affidavit at Exhibit "SSS" are Kurt's emails.
325. In December 2015 I had a falling-out with Kurt over personal matters unrelated to Elizabeth or Farber. I blocked him on all social media platforms and we went our separate ways. Despite this fall-out, all my blog posts still remained live on the ARC website, and the Amazon link to my

memoir *Race Traitor* was still up on the front page. All this changed in the spring of 2018, when the Canadian Anti-Hate Network (CAN) was created.

326. As soon as the Canadian Anti-Hate Collective was created, Kurt openly described himself as a member of their Advisory Board in a blog entry dated May 05, 2018, titled “Canadian Anti-Hate Network is Now Active”. The mutual publicity between both ARC and CAN was solidified when both Bernie Farber and Evan Balgord repeatedly requested that their own social media followers visit Anti-Racist Canada (Kurt Phillips)’s website or Patreon page to make donations. In turn, Anti-Racist Canada solicited their own followers base to make donations to the Canadian Anti-Hate Network. Also in the months that followed the inception of the Anti-Hate Network, and with full knowledge of my concerns and evidence regarding Elizabeth’s appropriations, Kurt began to like, retweet and endorse Elizabeth Moore’s tweets via the @ARCCollective Twitter account.
327. Concerned about the appropriation of my story, especially on a platform I had worked for and contributed to for four years, I wrote several emails addressed to Kurt and left comments on the ARC site, begging him to look at my information about Moore’s appropriation – a fact he was already aware of. I received no response, and proceeded to tweet to ARCCollective, using Kurt’s real name. On September 12, 2018, I was notified by a common friend, Daryle Lamont Jenkins, that lawyer Richard Warman had been asked by Kurt to request – via Daryle – that I take down the tweet I made in which I called out to “Kurt Phillips”. I deleted the initial tweet, but after feeling distressed that my concerns had still not been addressed – namely, Elizabeth Moore’s misrepresentation of my lived experiences and Kurt’s endorsement of her tweets on the ARC Twitter platform – I tweeted to Kurt again, and wrote him one last email in which I stated that I would expose their collusion if ARC’s endorsements of Moore did not stop.

328. Instead of responding, addressing my concerns, or even explaining WHY he was abruptly deleting all my articles without me having the possibility of backing them up, Kurt proceeded to scrub my contributions from the Anti-Racist Canada website, while continuing to endorse Canadian Anti-Hate Network members on both the ARC blog and the @ARCCollective Twitter account. Kurt erased every single article I wrote for Anti-Racist Canada between 2011-2015, and removed every blog post he had written in support of me and my book campaigns. I believe the only thing that remains on the website are several (uncredited) photos I took during Kurt's trip to Toronto, including of Zundel's former Carlton Street home, Wolfgang Droege's old apartment, and street photos of Heritage Front and Anti-Racist Action hangouts such as Sneaky Dee's restaurant. Although I was able to recover some of my posts via the Wayback Machine, at least two articles were not crawled and indexed by Google; as a result, they are lost forever.
329. Not only did Kurt erase every article I wrote for Anti-Racist Canada, but he removed a link to my book that he had expressly assured and promised me – in his email dated Nov. 21, 2011 – would remain permanently on the Anti-Racist Canada site. This overt scrubbing and erasure of all my contributions to Anti-Racist Canada – made over a span of 4 years – shows what I believe is clear evidence of collusion between ARC and Canadian Anti-Hate Network members to suppress and erase my contributions to anti-racism activism in Canada, and to shutting down the Heritage Front.
330. The Anti-Racist Canada blog (and the “ARC Collective” on Twitter) is a website that purports itself to be of journalistic value to the Canadian public and represents itself as a collective made up of several members. As such, I do not believe it should be up to a single individual with bias and competing interests to scrub all my articles from a platform I contributed to, nor to endorse a competitor who is actively appropriating parts of my life, because they are both members of the Canadian Anti-Hate Network.

331. This deliberate erasure has resulted in the depreciation of my career, engagements, book sales and my brand – both as an anti-racism activist, an educator, and a writer. Additionally, I have also lost the valuable comments and feedback posted by the public in response to my articles. The erasure of my contributions from the Anti-Racist Canada blog did not occur until Kurt Phillips became an active member of the Canadian Anti-Hate Network, and started receiving publicity and financial donations from CAN members. Attached to this affidavit at Exhibit “TTT” is evidence of ARC’s patronage by the Canadian Anti-Hate network.
332. As of today’s date, Anti-Racist Canada’s blog lists Evan Balgord – who, along with Bernie Farber, is a founder of the Canadian Anti-Hate Network (CAN) – as a financial donor. I do not know if Bernie Farber or Elizabeth Moore have also contributed financial donations. I believe it is possible that members of the Canadian Anti-Hate Network may see me as a competitor to their newly-established business of writing, lecturing, providing information to the community, receiving publicity, and engaging in paid workshops and speaking engagements. Since 2011 and up through and including 2015, I was actively writing on topics related to anti-racism and far-right extremism both on my blog and the ARC site, and worked with Kurt Phillips as a full ARCCollective member. Once CAN, the “new kids on the block”, came along and started sponsoring Kurt’s operation as Patreon, my posts and entire contribution for 5 years was systematically erased.

**Elizabeth Moore’s Injurious Falsehoods and my Exclusion from Barbara Perry’s Book**

333. I first met Professor Barbara Perry in person when we were both invited to present at Pegasus Conference in Toronto on Sunday, April 29, 2018. I had seen her interviewed on the news and knew she was a professor who specialized in hate crimes and far-right activity. After we were both

announced to be speakers sharing a panel at the Pegasus Conference, I added her as a contact via LinkedIn, and she accepted my connection request, but did not respond to my introductory email.

334. On April 29, I gave a presentation at the Pegasus Conference hosted at the University of Toronto campus and introduced myself to Ms. Perry. I found her demeanor toward me somewhat cold and standoffish, but dismissed it as “maybe that’s just her personality.” My partner and I helped her to successfully set up her computer for her presentation (her laptop initially couldn’t project and required a projector adaptor, which I had brought). After our presentations ended, I gave her a copy of my memoir *Race Traitor* and noted that she didn’t seem to want to talk with me – at that time, I assumed she was busy and rushing off to another presentation.
335. On May 31, 2018, I learned that Perry had organized a conference at her university, University of Ontario Institute of Technology (UOIT), on May 29-31. Several of my acquaintances, friends and colleagues from the Against Violent Extremism (AVE) network were attending the conference, and through photos posted on Twitter I realized that Elizabeth Moore was in attendance. On the same day, Elizabeth posted a photo of herself standing next to Perry on all her social media platforms.
336. I also found out from Marcell Wilson, a friend and colleague who also works (alongside me) for the Against Violent Extremism network, that Moore had bad-mouthed me to several people in attendance, including fellow colleague Brad Galloway and Barbara Perry, telling them that I had “harassed” her and I was “a stalker.”
337. I was afraid that Elizabeth had gone to the conference with the intent to misrepresent herself by appropriating my lived experiences, so I wrote an email to Professor Perry expressing my concerns. Perry never replied to my email. My concerns grew, and I wondered why Perry had seemed

reluctant to talk to me at the Pegasus conference and why she seemed to deliberately ignore my emails, particularly one involving a serious matter.

338. On July 28, 2018, I met with Marcell Wilson for lunch and he told me that he was being included in a new academic publication curated by Professor Perry and Adam Ellis. The book would be titled “Life After Hate: Trauma, Violence and Resilience”. According to Marcell Wilson (and the outline he forwarded me) the book would consist of chapters written by former extremists, detailing their journeys in and out of hate. Marcell told me that Barbara Perry had asked him if he knew of any other females who could be included in the book, since there were not enough female former extremists being represented in the book. Marcell thought of me immediately and mentioned me to Perry, referring to me as “a hero” – but she did not respond to his recommendation of me. At the end of our meeting, Marcell forwarded me an email from Adam Ellis containing an outline of the proposed chapters they were soliciting from former extremists.

339. Marcell urged me to write a blurb about myself and email it to Adam, who he considers a friend; according to Marcell, they were still looking for contributors and maybe Perry was just busy. He said he’d call Adam and give him a head’s up about it. That evening, I proceeded to write a 2.5-page document detailing my background and summarizing my journey in and out of the Heritage Front, and emailed it to Adam Ellis. On July 30, 2018 I received the following reply:

*“Hi Elisa,*

*Thanks for contacting me. I did receive your email and your story is something that would be a good fit for our text. I forwarded your email to my colleague and co author for her input. Will be in touch soon.”*

340. I waited a few days before writing back to Adam with questions regarding about the project deadline and approx. how many pages they wanted. Adam wrote back that same evening (Aug 2, 2018), indicating that the final decision for whether I would be included in the book was up to

Barbara Perry. “*Hi Elisa, Thanks for following up. Barb is on vacation, can we touch base maybe next week? I have to speak with her and confirm contributions before we move forward.*”

341. I did not hear back from Adam Ellis or from Barbara Perry. Shortly afterwards, I learned that Professor Perry was officially part of the Canadian Anti-Hate Network Advisory Board, which also includes Elizabeth Moore and Bernie Farber. Given her involvement with the Network, and her participation in speaking engagements, panels and events alongside Farber, I started to worry that I was being deliberately ignored. My fears were confirmed after the following five events took place:

1. Marcell told me that Elizabeth had attended a planning meeting where they discussed their publication in a book curated by Barbara Perry. He informed me that Elizabeth had made negative remarks about me in the presence of Perry, calling me a “stalker” and someone who had “threatened” her.

2. A dinner conversation with Brad Galloway in Montreal on November 12, 2018, where he informed me that Barb Perry was planning to include Elizabeth in the *Life After* book, and that Perry would pay Elizabeth for the contribution. We discussed concerns that Elizabeth’s unvetted inclusion would further legitimize what I believe is a fraudulent appropriation of my teenage experiences, and Brad told me he planned to speak with Perry and threaten to pull out of the book if Elizabeth was included. Despite his long activity with Canada’s far-right, Brad acknowledged that he had never heard of Elizabeth Moore prior to 2018.

3. A Facebook Messenger conversation with former extremist Lauren Manning on Nov 26, 2018, in which she described disparaging remarks made by Elizabeth about me on March 29, 2018, the day of Barbara Perry’s meeting about the proposed *Life After* book, when Elizabeth

had called me a “stalker”. Lauren’s comments mirrored what Marcell already told me; a copy of this conversation is attached to this affidavit at Exhibit “UUU”.

4. An email and telephone conversation with Toronto filmmaker Andrew Gregg, in which he informed me that he had met Elizabeth for coffee in October 2018, at which time she told him that she would be published in a textbook curated by Barbara Perry. Gregg also informed me that Elizabeth had represented herself to him as “the face” of the Heritage Front, someone who had been a prominent spokesperson, and who would soon be converting to Judaism and had a rabbi already helping with the process.

5. Moore’s own website, where she lists “Book Chapter” under her Projects tab.

342. I was devastated that I was being excluded from Barbara Perry’s publication and pre-publication meetings without any explanation as to why. Of all the former white supremacists being included in Perry’s book, none had played a part in testifying against their former comrades, or risked their lives to shut down a white supremacist organization, as I did at only 18 years of age. And yet, despite my decades-long contribution to erasing hate and radicalization in this country, I believe that I was being deliberately shut out due to Perry’s professional relationship with Bernie Farber and her participation in the Canadian Anti-Hate Network (where Moore is an Advisory Board member), an involvement that led to Perry receiving publicity and speaking engagements. A copy of social media posts depicting Perry’s engagement with Farber/CAN is attached to this affidavit at Exhibit “VVV”.

343. Believing that I was being deliberately ignored and prevented from publication due to collusion between Perry, Farber and Moore, I experienced extreme stress at the realization that my lived experiences may once again be appropriated through a textbook that would give Elizabeth further opportunities to promote her false narrative. On November 19, 2018, still having heard nothing from



either Adam Ellis or Barbara Perry, I emailed Adam to ask for an update and shared my concerns, while offering to present evidence of why I believed that Moore's narrative may consist of fraudulent appropriations of my story.

344. At 5:56 PM on November 23, 2018, I received the following reply from Adam Ellis:

“Hi Elisa,  
Thank you for reaching out to Barb and I. Your story sounds unique and informative. However, we have decided to not accept any other chapters at this point. We had a number of other submissions (that were submitted during summer), and although it would be great to add everyone to the text, it is just not feasible to do so at this point. Once again thank you for connecting with us and we wish you good luck in your future endeavors.  
Best,  
Adam”

345. I perceived this to be a standard-form rejection which did not address my concerns, or the fact that I had written them in the middle of summer with my proposed chapter, and Adam Ellis himself had previously stated that my outline was a “good fit” for the book. I wrote back to Adam and said:

“I understand your response, but it doesn't actually address my concerns about Elizabeth Moore's fraudulent appropriation of many aspects of my back story, nor the obvious collusion I see between Perry, Farber, Moore and the Antihate.ca network. It also doesn't address the fact that Perry has deliberately ignored my messages for the past year, despite my repeated attempts to convey my concerns, and other people's attempts to convey their concerns (i.e. Marcell and Brad) to her, only to be ignored and shut down. I believe this action shows premeditated bias against me on Perry's part.”

346. Once again, I received no response. Half an hour later, I contacted Mubin Shaikh via Facebook Messenger. Mubin is a fellow Against Violent Extremism (AVE) colleague who I first befriended on social media and then presented with at Columbia University in New York, and at a 2018 panel event in Montreal. I asked Mubin if he was being included in Professor Barbara Perry's book, and he told me that yes, he was – but confessed that he had not even started on it.

347. Mubin Shaikh informed me that Adam Ellis had just emailed and asked him to write a chapter. At 6:17 PM on November 23, just 21 minutes after rejecting my proposed chapter submission for Barbara Perry's book under the pretext that they had “already received all their submissions” in the

summer and it wasn't feasible to add any more, Adam Ellis emailed Mubin Shaikh to ask him "to submit some sentences." Mubin told me that it was the first time in months that he'd heard from Adam Ellis until that evening, when Adam's "email came in at 6:17" PM.

348. Extremely upset that I was being intentionally excluded while Ellis was soliciting new submissions from another former extremist even after rejecting my proposal, I sent him a follow-up email:

"One more thing - I actually have correspondence evidence from at least one individual who is getting included in this book but never submitted in the summer, and who actually STILL hasn't given you a chapter, so your canned response is, in my humble opinion, BS. Also, my correspondence with Barb started before the summer. And I wrote you directly in July - well before this other individual was ever involved in the project."

349. As I expected, Adam Ellis did not respond. I believe my evidence demonstrates that Ellis, acting on behalf of Barbara Perry, continued to solicit chapter submissions for their book – such as asking Mubin Shaikh to write something – even after sending me a rejection letter that claimed my chapter proposal was being rejected due to having received all entries earlier that summer. Attached to this affidavit at Exhibit "WWW" is my correspondence with Adam Ellis and Mubin Shaikh.

350. I believe that the deliberate omission and exclusion of my story from publication by Perry and Ellis, coupled with the fact that Elizabeth's chapter was already approved and she is Perry's fellow Canadian Anti-Hate Network Board member, are part of the civil conspiracy against me. I also believe that my proposed chapter was rejected because Elizabeth spread negative and derogatory comments about me to Perry, as witnessed by Marcell Wilson and Lauren Manning – it explains Perry's standoffish behaviour toward me at the Pegasus Conference and her refusal to answer my emails. Elizabeth's derogatory words about me to Perry and my colleagues form an injurious falsehood aimed at destroying my career, my reputation, and my identity as the person actually responsible for helping to shut down the Heritage Front.

351. I believe that Elizabeth is spreading falsehoods about me in an effort to continue her appropriations of my life – to represent herself as “the face” of the Front and someone who “shut it down” and is “soon-to-be-Jewish” – as well as suppress my evidence-based account of what really happened in the 1990s and during the production of *White Lies*. According to both Marcell and Lauren, the group meeting with Barbara Perry that Elizabeth had attended happened in March 2018. At that time Elizabeth did not have a website or was just in the process of publishing it, and Perry does not own a Twitter account. Therefore, I believe that Elizabeth may have been introduced to Perry through Bernie Farber, who had a preexisting relationship with Perry.
352. I believe that my exclusion from the textbook – and Elizabeth’s automatic inclusion – also stems from a conflict of interest on Perry’s part, particularly as she has received multiple speaking engagements, publicity and endorsement from Anti-Hate Network Chair Bernie Farber. Throughout 2018, Barbara Perry and Bernie Farber have appeared in several public forums, panel engagements, and media interviews. She has been appointed to the Anti-Hate Advisory Board and I believe she has profited from public engagements, potential financial earnings and media exposure organized by Farber and the Anti-Hate network. Consequently, I believe that Perry’s working relationship with the Defendants and an organization that she benefits from commercially, may have led to her showing favouritism toward the Defendants and her failure to conduct due diligence according to an academic and ethical standard.
353. This collusion reflects what I believe is a pattern of bias against me on the part of Canadian Anti-Hate Network members that has led to deliberate, systematic omission and erasure of my decades-long contributions to the anti-racism movement and to shutting down the Heritage Front. I believe this is the concerted effort of a network of people to prop up the fraudulent, appropriative narrative of one of their members, Elizabeth Moore, and using this fraudulent narrative to legitimize and

monetize their new non-profit organization, while simultaneously blocking and excluding me from opportunities to obtain work in the same field, regardless of the fact that:

- a) As a teenager, I spied on and testified against 3 leaders of the Heritage Front and was central to their convictions and subsequent jail sentences, which contributed to the group's collapse.
- b) I wrote and signed multiple affidavits that were submitted to the Ontario Provincial Police (OPP) detailing white supremacists' criminal activities and illegal weapons.
- c) Since coming out of the closet at age 18 and converting to Judaism in my 30s, I have been a speaker for many local and national Jewish and LGBTQ organizations.
- d) I was a contributor to the Anti-Racist Canada blog and part of the ARC Collective for 4 years, between 2011-2015.
- e) I am a Regional Coordinator for Central Canada and the United States for the UK-based Institute for Strategic Dialogue's Against Violent Extremism Network (AVE) project.
- f) I have collaborated on 2 important initiatives with Montreal's Centre for the Prevention of Radicalization Leading to Violence (CPRLV, also known as Info-Radical), including the development of a nation-wide educational strategy for youth and high school students and an educator's guidebook, as well as a comic book based in part on my life story.
- g) I have been a speaker and writer on anti-racism issues between 1993-1995 and 2011-2019. Using both personal experience and my criminology background, I have spoken about countering violent extremism (CVE) at university campuses across North America.
- h) I have formally studied radicalization for years. In 1999, I graduated Magna cum Laude from the University of Ottawa with a double major in criminology and psychology.
- i) I have volunteered in detention centres and with disadvantaged women and young offenders.

- j) I wrote a memoir about my experiences that is, to date, the only written account of a young woman's involvement in the far-right in Canada, and the only account of life inside the Heritage Front, as well as CSIS's Operation Governor.
354. The majority of Elizabeth Moore's involvement in anti-racism initiatives have primarily consisted of initiatives created by Bernie Farber or Len Rudner. She never provided information to police, or played any role whatsoever in shutting down the Heritage Front. She does not have a criminology degree, experience in working with former extremists or in the criminal justice system, nor has she ever studied extremists or political violence as part of an academic education. According to Elizabeth's own website, she has not participated in anti-racism engagements since 2003 or 2005, until the creation of the Anti-Hate Network in 2018.
355. Despite: 1) the lack of evidence to substantiate Elizabeth's exaggerated claims of importance in the Heritage Front, 2) a history of Elizabeth incorporating my lived experiences into her narrative, and 3) the overwhelming evidence showing that I was the only female spokesperson for the Heritage Front, Barbara Perry still decided that she would publish Moore's account, exclude mine, and deliberately ignored all my attempts at addressing this issue with both herself and Adam Ellis. I believe this action is the result of a conspiracy between the Defendants to promote Elizabeth and deliberately exclude me from publication, as well as due to Elizabeth's malicious comments about me to Perry and my AVE colleagues Marcell Wilson and Lauren Manning.

#### **Elizabeth Moore's Miscellaneous Allegations**

356. At paragraph 39 of her affidavit Elizabeth alleges that in the Hearts of Hate documentary, which featured dozens of Canadian white supremacists, I said that she had taken over the "role as the woman in the [Heritage Front] movement." Although I acknowledge that I made the statement

during the taping of Hearts of Hate in 1994, it was an expressed opinion and not a matter of fact. At the time of taping I had been out of the Heritage Front for at least six months. I had never seen Elizabeth Moore at a single event, and did not know her. The only interaction I had had with her was through our phone call a year earlier, where I tried to dissuade her from joining the group. The opinion I offered the Hearts of Hate producers, who asked me to comment on a woman I did not know and had never met, was an estimation based on my own trajectory in the movement.

357. Only in 2013, after I was contacted by Elizabeth and we became friends, did I realize that her role had been much more limited than mine. I believe a significant reason for this was due to the fact Elizabeth was attending Queen's University in Kingston, ON (a nearly 3-hour distance from Toronto) during the entire year she became active with the Heritage Front. Because of the distance and not being around the HF leadership cadre every day, she was less privy to confidential discussions or able to take a more significant role. After we became friends and had conversations about our roles in the HF, Elizabeth admitted that the HF core group never took her into confidence; according to her, they learned their lesson with me and "were still smarting" from my defection.
358. In Hearts of Hate, Elizabeth – who was 20 years old at the time of filming and in her second year of university at Queens - admits on camera that she had only taken an "active role" in the six months leading up to the shoot. At the 30:29-minute mark, she states: *"In the past six months, my personal involvement with the Heritage Front has obviously increased by leaps and bounds, as I'm working on the magazine a fair bit, which is more or less my favourite thing to do."* In the years that followed, Elizabeth went on to tell journalists and post on her website that she joined the Heritage Front in 1992 (in at least two published accounts she claimed to have joined in 1991) despite there being no evidence of her activity in the Heritage Front until mid-1993. Her words in Hearts of Hate

solidify the fact that in 1994, at the age of twenty and in 2<sup>nd</sup> year of university, Elizabeth admits that her activity, including her involvement with Up Front, had ramped up just “in the past six months.”

359. At the time I offered my mistaken opinion to the Hearts of Hate producers, I believe I was unaware that Elizabeth had started a telephone line called “The Euro-Canadian Freedom Front” that served as a proxy to the official Heritage Front hotline, which was under a court order preventing the dissemination of further messages pending a Human Rights Commission trial. Had I been aware of this, it immediately would have signaled to me that Elizabeth was being used to circumvent the court order, which would mean that Wolfgang would ensure that she was NOT an official, card-carrying member. Both Wolfgang and Ken Barker went to jail, despite forging a backdated “resignation letter”, for creating a secondary hotline while Ken was still an official Heritage Front member. I was the key witness in that case. For Elizabeth not to be arrested, nor the HF to incur more financial penalties for disobeying Judge Joyal’s injunction, she would have to remain a fringe non-member, only distantly associated with the HF and certainly not its next public spokeswoman.

360. At paragraph 48 of her affidavit, Elizabeth asserts that my litigation was preceded by a Cease & Desist letter sent to me on September 17, 2018. I believe that Elizabeth is suggesting that I sued her because she sent me this letter, which is false. Elizabeth’s C&D letter came long after I already established my concerns about Elizabeth’s fraudulent appropriations, both in the White Lies and after Charlottesville. In fact, I believe that Elizabeth contacted a lawyer and sent me this letter as a reactionary response to my public statements about my intent to pursue a lawsuit, as follow:

- a) In February 2015, in my blog post “White Lies: How the CBC Stole My Story”, I first expressed my interest to file a lawsuit regarding the appropriations in White Lies; however, due to Limitations Act, I could not.

- b) In August 2017, after Elizabeth appeared on the front cover of the Ottawa Citizen and appropriated significant elements of my lived experiences, I shared my concerns publicly on my social media Facebook page, and again stated that I wanted to pursue a lawsuit against Moore, while soliciting advice from my Facebook friends.
- c) In early Sept 2017, right after I learned that Elizabeth and Farber were going to appear on The Agenda - I wrote to lawyer Paul Copeland and asked him to help. I also contacted lawyer Lisa Gellman, who had been a sponsor of the Hadassah-WIZO fundraising event I headlined back in March 2017 about taking legal action.
- d) After Elizabeth's and Farber's comments on The Agenda, I wrote on my social platforms that I intended to pursue legal action against Elizabeth. My concerns about her appropriations were well-established long before she ever attempted to send me a C&D letter. I believe that Elizabeth knew I was planning to commence litigation and was in the process of searching for a legal counsel when she attempted to preempt my action with her Cease & Desist letter.

361. At Paragraph 60 of her affidavit, Elizabeth quotes a tweet I sent to a Twitter user on February 22, 2019 and implies that I am "joking" about a letter her attorney sent me the day before. Contrary to what Elizabeth might believe, I was responding to a question unrelated to Elizabeth. This is not the only time I have given a general opinion on such letters. I believe that Elizabeth's accusation is reaching and deceptively worded to imply my tweet was intended for her when in fact I was offering my non-professional opinion on cease and desist letters in general.

362. Elizabeth's baseless allegation at paragraph 60 that my tweet to a stranger on Twitter is part of a "smear campaign" underscores my belief that Elizabeth has made a habit of scouring my social media feed for any possible ways, however remote or minute, to interpret my interactions with



friends, followers and other Twitter users as a personal attack on her. Such behaviour on her part, along with my perception that I am being watched relentlessly by someone who I believe is obsessed with me, is a large reason why I am posting less and less on my social media platforms – this, in turn, has impeded my ability to promote myself and advertise my events.

363. In Exhibit “E” of her affidavit, Elizabeth accuses me of sending a friend request to a Facebook friend of hers. Anyone familiar with Facebook knows that Facebook offers friend suggestions based on varied algorithms, and that is what I believe happened on the night of September 5, 2017, when I sent out approx. 20 friend requests. On September 6 I received an angry email from Elizabeth, accompanied by a screenshot of my friend request. I informed her that I had sent out the request during an evening when I friend-requested several other people, many of which were prompted by Facebook friend suggestions. I advised Elizabeth not to communicate with me and that I would contact police if she persisted. Besides sending a Friend Request as a result of a suggestion made by Facebook’s algorithms, at no point in time did I send any DM message or communicate with Elizabeth’s friend, whoever they may be - and since I wasn’t sure who it was among the approx. 20 persons, male and female, to whom I had sent Friend Requests the previous evening, I decided to err on the side of caution and removed all my most recent friend requests.

364. I have no interest in having any mutual friends with Elizabeth, particularly given the incident with Tracie Sands. When Tracie told me that Elizabeth and herself had discussed my 2016 suicide attempt and had engaged in other conversations about me where Elizabeth had made offensive comments, I was left shaken. As a result of Tracie telling me that Elizabeth urged her to “find out things” on me, I closely scrutinize every new friend request before deciding whether to accept it. Although I have blocked Elizabeth on all my social media platforms, it is impossible to ascertain if we may have other friends in common. As a result, I rarely post information about my upcoming

events, even in my private, friends-only Facebook account, and I no longer post information about events on my public Facebook page until the event has ended.

365. At paragraph 50, Elizabeth complains that she first received my Statement of Claim after a journalist approached her for comment on December 18, 2018, and she was not served until the 19<sup>th</sup>. I believe Elizabeth is trying to suggest that I acted improperly by contacting the press before she was served. In fact, I hired my process server and paid for the service on December 17, 2018, expecting that it would be delivered the next day. I was also informed that the document was left with her husband Soren rather than served personally to Elizabeth, as she claims. Attached to this affidavit is a copy of my receipt/confirmation from Borg Process Servers, at Exhibit “XXX”.

**Elizabeth Moore’s Actions have Damaged my Livelihood**

366. With the exception of her February 21, 2015 email where she placed the blame entirely on White Lies scriptwriter and producer Dennis Foon, Elizabeth has not addressed my concerns about her appropriating my life. If she really believed that I was angry, confused and mistaken, she certainly never made the slightest effort to correct my supposedly wrong assumptions. Instead, she cyber-stalked me for four years, called me a stalker and implied I would commit violence against her, repeated these malicious accusations to my friends and colleagues, and countersued me for defamation without offering any proof to back up her assertion that she shut down the Heritage Front or even that she was an official member of the group, much less its “pretty, public face”.
367. I believe that Elizabeth is self-righteous and thinks of herself as too above reproach to dignify my evidence-backed accusations with a response, or provide any proof and evidence to authenticate her own exaggerated claims of significance both within the Heritage Front, and in its downfall. Openly addressing my fact-based allegations would shatter the brittle veneer she has so carefully built over

the last twenty-four years, a veneer of respectability built on lies and a fraudulent misrepresentation of my lived experiences. I believe that Elizabeth lives in her own reality, a reality where people who expose frauds are villains and people who commit them are victims.

368. I believe that Elizabeth would rather take her chances with a Motion for summary judgement than expose herself to the Discovery process or face me at Trial; that she would rather tell the whole world that I stalked and defamed her without any motive than have a single conversation with me, either directly or facilitated by our lawyers, that would provide any semblance of an explanation for her tortious behaviour. When confronted with proof of lies and inconsistencies, Elizabeth opted not to end her fraudulent misrepresentations but instead doubled-down and continued to exploit my life with the claim that she had helped to shut down the Heritage Front.

369. I believe that Elizabeth's reluctance to address allegations I have consistently made since 2015, which she claims are baseless, malicious and defamatory, reflects her awareness of wrongdoing. She would rather cyber-stalk me relentlessly for four years, go to police to allege I stole "her" domains, and portray herself as a blameless victim targeted by an irrational stalker who, for two years, was a close friend and (in her own words) her "soul sister" and suddenly, overnight and for no apparent reason, accused her of fraudulent behaviour – than to participate in an arbitration or mediation process where she might be forced to review her deceitful actions. I believe that her single-minded approach of intimidating me with police threats of arrest and, only after I commenced litigation against her, with a SLAPP countersuit, is an effort to silence my legitimate concerns and reflects her knowledge that she has no explanation to justify her predatory exploitation of my life.

370. I deny that any and all comments I have ever made about Elizabeth are defamatory, untrue, made with the intent to interfere with her economic relations, and that they led to any financial loss and damages, and I put her to strict proof thereof. Nearly all of Elizabeth's projects and speaking

engagements come via the same network of people who have endorsed her since the 1990s and continue to do so in spite of clear evidence that she has fabricated, exaggerated or appropriated at least part of her inconsistent and deceitful narrative.

371. At paragraph 58 of her affidavit, Elizabeth falsely claims that all my “defamatory” statements about her are untrue and intended to “disparage” her reputation. In fact, I believe that everything I communicated about her is true, and I believe that I have provided evidence in this Affidavit to substantiate them. I believe that Elizabeth’s appropriations of my lived experiences are fraudulent, illegal and unethical. I also believe that the following statements about Elizabeth are not defamatory, have caused her no financial damages, and are substantially true:

- a) “A stalker” – as noted by Elizabeth’s extensive IP visits on my website since 2015, her continued attempts to connect and communicate with my friends, colleagues, criminology contacts and synagogue acquaintances, and her own admission in her affidavit that she indeed “tracks” all my social media platforms, I do not believe this characterization to be untruthful.
- b) “A mistress” – Elizabeth was Len Rudner’s mistress, as indicated by Rudner’s correspondence and Elizabeth’s own admission in her Statement of Defence and her Affidavit indicating she had “an affair with a married man”. My decision to discuss their affair was entirely due to the fact that I believe it is impossible to separate or ignore the fact that Elizabeth was having an affair with the Director of the CJC responsible for Community Projects at the same time she was given paid opportunities such as speaking engagements and a second film role (the first film, *White Lies*, also being secured through Elizabeth’s connections with the CJC), to the exclusion of myself and other reformed extremists. I believe that Elizabeth’s appropriation of my life was enabled and disseminated through her personal and intimate relationships with

Canadian Jewish Congress directors. As a journalist, a member of the Jewish community and the subject of potential exploitation, I believe I have a right to fair comment on the matter.

- c) “A liar” – yes, I absolutely believe that Elizabeth is a liar, based on documented evidence I have gathered of her inconsistencies and fraudulent appropriations of my lived experiences, starting in 1995 (as evidenced by her lies in the CAERS tape) and continuing into 2019. I also believe her appropriative behaviour shows no signs of slowing or ending.
- d) “Dangerous” – I believe that I have provided the Court with evidence of Elizabeth’s disturbed and disordered thinking based on a documented history of exaggerations and fraudulent appropriations. Her relentless cyber-stalking, which in 2019 progressed to Elizabeth filming my synagogue and congregation, makes me feel continuously unsafe. I feel endangered by her actions, and I feel that my livelihood is in danger due to her persistent dissemination of falsehoods to my own friends and colleagues.
- e) “A Person who is not to be trusted” – Elizabeth’s inconsistent narrative and lies are evident not only in her ever-changing story, but in linguistic reframing and changing her language and phraseology to accommodate for being caught in a lie, such as switching from asserting that “I *joined* the HF in high school” to “I was in high school when *I became introduced* to the HF” after I filed my Statement of Claim, or “I was the only white girl in class” to “I *felt like* I was the only white girl in the class” at paragraph 64 (b) of her affidavit.
- f) “Homophobic/bigoted” – after an incident in May 2018 where Elizabeth linked homosexuality or bisexuality to joining a neo-Nazi group, she experienced significant backlash on social media platforms Twitter and Medium. Tens of thousands of people called her homophobic or shared tweets made by other social media influencers that similarly called her a homophobe.

During that time, and because of Elizabeth's appropriation of my story, Twitter users believed I had made those comments and attacked me viciously online. I had no choice but to correct them and state that no, I had not made those homophobic comments but Elizabeth did.

- g) "Delusional / Suffering from mental illness" – While it might be unpleasant for Elizabeth to admit that she has an extensive history of psychiatric care and prescribed medications, it is not defamatory for me to bring up this truth in the context of a possible explanation for her 25-year fixation on me and my lived experiences. I believe Elizabeth exhibited delusional thinking when she involved police and tried to have me arrested because I "stole" publicly-available domains that she believes belong exclusively to her. Over the two-year course of our friendship, both in Facebook Messenger communications and during in-person meetings, Elizabeth told me that she had been on psychiatric medications, and that "every therapist" she had met after her exit from the Heritage Front thought she was "paranoid". Bernie Farber also told that "she is not well" during our 2014 meeting. Elizabeth's own behaviour, coupled with exaggerations and inconsistencies in her narrative and the obsessive nature of her cyber-stalking, have convinced me that she has, at times, exhibited delusional behaviour.

### **Evidence of Disordered and Exaggerated Thinking**

372. I believe that Elizabeth has demonstrated a pattern of disordered thinking, and that she has a tendency toward exaggeration and reframing events after they happen. My belief is based on the following examples, which are attached to this affidavit at Exhibit "YYY":

- a) The situation with Len Rudner, where she engaged in a consensual sexual relationship that involved sadomasochism and lasted years. In her 2014 Facebook Messenger conversation and during our last face-to-face meeting, she described him as a "sexual predator".

- b) In the spring of 2014, soon after I published my new memoir *Race Traitor*, I met Bernie Farber for lunch. During our lunch at a Japanese restaurant across from his office, Elizabeth's name had come up. I told Bernie that we had become friends a year earlier, at which point Bernie leaned across the table and said, "She's not well, you know." I believe that he was implying that Elizabeth was not mentally healthy.
- c) Elizabeth's comment in her 2011 documentary "In God's Keeping". At the 13:25 minute mark, her husband Soren says: "*If you think about it, of all the things you run into in the world, you don't run into God.*" To this, Elizabeth replies, "*I do – all the time. And angels.*"
- d) Elizabeth's belief that she sees angels and spirits is also evident in her creation of the Twitter account @MmeHeartless, where she offers psychic advice from an "angel deck".
- e) Elizabeth and I spoke openly about our mental health; I had asked her for advice about medications for my depression and she recommended her psychiatrist (in a Facebook Messenger conversation dated February 6, 2015; in an email sent on January 26, 2013, she had already told me that she had been hooked on benzodiazepines for years.
- f) In a Facebook Messenger dated April 7, 2014, Elizabeth writes: "*my therapists (I went through a few) all thought I was paranoid.*"
- g) Elizabeth's belief that the domains I lawfully purchased belong to her, to the point she solicited police to threaten me with arrest for "stealing" them from her; her belief that the domains are her intellectual property, and that she suffered significant damages as a result, despite the fact that only a few months earlier she had lost her "only paying client".

- h) Elizabeth's statement on her Facebook page that reflects her belief that she had engaged in anti-racism talks before I did, which is a misconception since I defected in 1993 and gave a number of talks while she was still involved in the white supremacist movement.
- i) Elizabeth's tendency to exaggerate is evident in the way she describes a woman who attended the 1994 Thanksgiving party where she made up her mind to leave the Heritage Front. In the CAERS Tape 19, she expresses what I believe is jealousy after Wolfgang had brought along his girlfriend, who wore "*this slinky little black dress*" that Elizabeth felt made her "*look like a stripper*". Elizabeth claims that she didn't "*begrudge him having a girlfriend, it was just obvious to me that he was just using her for sexual favors*" instead of choosing to partner with "*a woman with a mind*". Wolfgang's girlfriend at the time was an attractive blonde named Marque Poole-Jewer who liked to wear form-fitting dresses, but she was not a stripper. At paragraph 9 of her affidavit, 25 years after that party, Elizabeth progresses from remembering one woman whose slinky dress made her "*look like a stripper*" to "*sex workers*" (plural) being in attendance.

### **Evidence of Damages**

373. In the last decade I have spent thousands of dollars in marketing to advertise myself as a writer and educator on the subject of far-right radicalization, and this does not include the four years of study and tuition I spent at the University of Ottawa, earning my degree in criminology and psychology. Despite my expertise in the subject area, and in spite of her lack of education or formal training in this field, through her alliance with Bernie Farber and Len Rudner Elizabeth has gained the unfair advantage of being represented as an "expert" to police, government organizations, community groups and impressionable students. Through Farber's endorsement and connections, Elizabeth



gained financial benefits, publicity and privileges without even initially having a website or educational background in this field.

374. Any projects or opportunities I have gained as a speaker and educator were done so on my own merits, without the enabling support of influencers and ex-lovers, or by appropriating someone else's lived experiences. I have had a website and active blog since 2007. Any consulting or speaking engagements I have received have been as a direct result of my own work and reputation. I can say without hesitation that I know of no situations whatsoever where I took an opportunity away from Elizabeth and was hired in her place.
375. I believe that Elizabeth's entire marketing platform as an "anti-racist activist" up to 2018 has been attained through Bernie Farber. She did not even have a website until after Charlottesville, when Farber began to invite her to participate in events. On her website, the first speaking engagement she lists since 2003 was an event for police/govt with Bernie Farber. From looking at her website and marketing materials, it appears that she had not spoken publicly about any anti-racism or had working knowledge about current 21<sup>st</sup> alt-right groups for at least 15 years – and yet represented herself on CTV's The Social as having "dedicated her adult life to anti-racism work."
376. I believe that Elizabeth did not feel the need to own a website or spend money to advertise herself because she enjoyed the benefit of Bernie Farber or Len Rudner freely throwing projects her way; she did not feel the need to advertise herself when they could do it for her. In my mind, this explains why she did not register "her" name domains until I registered them in 2015 for approx. \$10 each. The impugned domains, which she claims in her affidavit are preventing her from doing business under her name and are part of her defamation suit, were not a priority to her until I bought them.

377. Despite Elizabeth not having had a speaking engagement since 2003 (according to her website's roster of speaking events), no educational qualifications in the field of criminology, psychology or countering radicalization, or even a website at the time of her first 2017 engagement with Bernie Farber, Farber still chose to involve her, along with her former lover Len Rudner, in projects involving providing expert advice to police and government organizations. Although I don't have a way to prove how much financial remuneration Elizabeth has received from her work with Farber and Rudner without going through the Discovery process, I presume she was compensated.
378. Elizabeth has offered no proof of any damages. Although she is counter-suing me for defamation and claims that she suffered financial losses as a result of me publicly questioning the collusion I perceive between herself, Bernie Farber and Len Rudner, to this day Elizabeth continues to be on the Advisory Board of the Anti-Hate Network. Even after my litigation was commenced, Elizabeth continued to participate in public events hosted or organized by Bernie Farber and his associates. Farber continues to endorse her publicly on social media through likes, retweets and shout-outs.
379. None of Elizabeth's events have ever been cancelled as a result of my actions. Given the fact that the vast majority of all the events Elizabeth has ever participated in since 1995 (whether as a speaker, consultant, documentary participant or panelist) came as a result of Bernie Farber or Len Rudner inviting her to participate, I believe that she has suffered absolutely no financial damages. In fact, despite a lack of education and subject matter expertise in this area, and any visible marketing ad campaign to promote herself, I believe that Elizabeth has enjoyed unfair advantages over myself and others who might have been better qualified to speak on the subject, but did not have the close personal relationships with Farber and Rudner that Elizabeth has benefitted from.
380. I believe that just because someone surrounds themselves with a circle of well-connected, privileged friends does not erase the truth. In my case, the truth is that a well-connected, affluent woman was

able to steal the most courageous thing I've done in my life – helping to shut down the Heritage Front at age 18, without police protection and under threats of death – and monetize it for over two decades. And then, when I spoke up about the exploitation of my lived experiences and identity, she depicted me as a potentially dangerous and violent person aligned with social media neo-Nazis, as a way to destroy my reputation while holding herself up as an irreproachable, unblemished member of the community despite a plethora of incontrovertible lies and inconsistencies in her narrative.

381. Through her relentless cyber-stalking and constant monitoring of my life, Elizabeth has participated and engaged in activities that prompted me to make public comments intended to draw attention to the fact I felt – and continue to feel – stalked by her. If it were not for her IP frequently visiting my sites and for her relentless appropriation of my lived experiences, my public bio and adding most of my criminology and journalist contacts on Twitter as her own contacts, I would not feel that I had no choice but to make comments Elizabeth alleges are “defamatory”, an accusation which I deny.
382. Since 2009, I worked hard to market myself and build relationships and contacts that Elizabeth, seemingly overnight, decided to add as her own Twitter contacts and market herself to them, using a bio nearly identical to mine. Precisely because of this activity, I wanted to alert friends and colleagues that someone was actively impersonating parts of my lived experiences, and my social media bio, on social media platforms. My words and actions were as a direct result of my concern and fear over what I believed was disturbed and obsessive behaviour on Elizabeth's part. Since 2015, Elizabeth's continued cyber-stalking and appropriations of my life created a constant climate of fear and dread that have taken an excruciating toll on my physical and mental health.

### **Elizabeth Moore's Continued Appropriation and Exploitation of my Lived Experiences**

383. When I first approached Elizabeth about the blatant appropriations of my lived experiences in *White Lies*, which was and continues to be attributed exclusively to her on Elizabeth's and Dennis Foon's website, Elizabeth claimed she was just a consultant for *White Lies* and it was not her responsibility that writer/producer Dennis Foon researched my life and incorporated it into his film. At paragraph 64 (j) Elizabeth also insists that she was merely "a consultant". However, I have never heard of a consultant hiring an entertainment agent to broker a movie deal with the CBC. The fact that Elizabeth, at Foon's urging, states that she "got an agent and she got me a good deal" indicates that although she was credited as a consultant for *White Lies*, likely as part of her film deal, she had represented *White Lies* as her own unique life story in order to sell it to the CBC and get a film "deal" via an agent. This is confirmed by multiple articles surrounding the film's release that collectively cite Elizabeth as the sole inspiration for the film.
384. As of today's date, Elizabeth's website and social media platforms describe her as "The verifiable inspiration" for the film. Even when confronted on Reddit in 2018, she repeated this lie. Up to and including 2019, Elizabeth continues to assert that *White Lies* is her "verifiable" story, and that any additional research or appropriations of my life that added to the storyline were the result of the producers' fault or the CBC's fault, despite evidence of her appropriations starting 3 years earlier.
385. For over two decades Elizabeth has continued to enjoy benefits from these appropriations. At no point did Elizabeth stand up to the CBC or publicly acknowledge that Foon may have researched my life and blended it into the film's composite character, and then attributed the film as solely based on Elizabeth Moore's so-called experiences. As a paid consultant actively involved in the production, and someone who was publicized as the sole inspiration and source for the film - it was up to her to state unequivocally "No, this didn't happen to me," or "No, I feel uncomfortable with

you slapping the words ‘A True Story’ on the cover of the movie.” Instead, Elizabeth profited – and continues to profit – from the misperception that *White Lies* represents her experiences exclusively.

386. There is no doubt in my mind that Elizabeth Moore took, without permission, unique, identifiable characteristics of my identity and events that happened to me and misattributed them to herself - both in the creation, promotion and monetization of 1998’s *White Lies* (which she continues to use as a vehicle for self-promotion up to and including 2019), and in the deliberate creation of a false narrative that conflates my history with her own, and that she has used to promote herself in media interviews, social media platforms and her website up to and including 2019.

387. I believe that *White Lies* constitutes the principal vehicle through which Elizabeth was able to appropriate my lived experiences as a teenager. I also feel this is the reason why she has adjusted her timeline to match both my life and the fictionalized character "Catherine Chapman" more closely, why she continues to insist that she was a teenager when she became active in the Heritage Front, and why she uses words like "defection" to describe her uneventful exit from the Front.

388. I believe that Elizabeth’s false assertion on Reddit that *White Lies* represents "100%" of her experiences represents an ongoing appropriation of my life, and I believe that she is using the film as a means to appropriate parts of my teenage years with impunity, thinking that she cannot be sued since the film was released in 1998 and I am barred from suing her due to the Limitations Act.

389. By continuously representing herself as “the verifiable inspiration” of *White Lies* across her multiple social media platforms and on her website in 2019, I believe that Elizabeth is persistently appropriating my life – since the majority of *White Lies* represents my lived experiences and not hers. This appropriation continues to this day and has been disseminated across the internet, on

television, in newspapers, in film VHS and DVD sales, in her public engagements and on her own website and social media pages, and is therefore not beyond the status of limitations for this lawsuit.

390. I believe that Elizabeth deliberately set out to methodically cherry-pick aspects of my life that she could represent and market as her own, with the full knowledge of my story and with the express awareness that I was living in hiding and would be in actual danger if I were to reemerge and challenge her claims. Furthermore, before the Internet age, living in a different province and city, I would be less likely to read, hear, or find out about her appropriations or have the funds to launch and wage a legal fight against her, the CBC or the CJC.

391. I have made my conclusions based on:

- 1) The historical fact that Elizabeth did not have contact with the Heritage Front prior to 1993, that as of May 1993 she admits she still had not joined the group, and based on the fact that no members of the Heritage Front interacted with her until late 1993, when she was a 19 or 20-year old university student.
- 2) Falsehoods and inconsistencies in the CAERS tape, which show that as of 1995 Elizabeth already started appropriating my story and exaggerating her experiences in the HF. The 1995 CAERS tape shows that Elizabeth's lies and inconsistencies precede the 1998 release of *White Lies* by 3 years and occur before Dennis Foon began researching my life for the film, leading me to believe Elizabeth purposely misrepresented her experiences to Foon and CBC.
- 3) Elizabeth's decision to perpetuate the false impression that *White Lies* was based solely on her experiences throughout the media blitz that accompanied the film's release, most notably captured in Elizabeth's 1998 *Globe and Mail* interview where she asserts that *White Lies* is:

*“an unnervingly accurate portrayal of her experience. “I’ve watched the film now about six times and I’ve never gotten through it without crying,” she said.”*

- 4) Elizabeth’s deceitful representation of herself as the exclusive, “verifiable” inspiration of White Lies between 2017-2019, and the fact that even when questioned on Reddit in 2018 about my claim, she still insisted the film was a “100%” representation of her lived experiences, which it is not.

392. I believe that Elizabeth’s Motion to dismiss my case reflects her reluctance to disclose, via a Discovery Process, the paperwork, contract and remuneration she received from the CBC, because it would reveal incontrovertible evidence that she had appropriated elements of my life and represented our conflated story as hers to the CBC in order to sell “her” film rights. Subpoenaing Dennis Foon, Len Rudner and journalists who interacted with Elizabeth, as well as other experts and witnesses, is very likely going to produce evidence that I believe Elizabeth wants to hide.

393. At paragraph 95, Elizabeth maintains that “I want to be able to promote myself, and my accomplishments, without worrying about how my words will be twisted against me.” The problem with her statement is that the accomplishments she claims are hers – such as shutting down the Heritage Front, being its “pretty, public face”, being “a teenager” who “rose up the ranks”, being a “media spokesperson” and a “speaker at meetings” who subsequently “defected” do not, in fact, belong to her. I believe that Elizabeth craves media attention and is using journalists unfamiliar with the history of the Heritage Front and its downfall to create a new, reinvented portfolio of false accomplishments for herself, as a way to monetize her initial fraud into the 21st century.

394. I believe that Elizabeth has made every effort, including lying, to generate fame and publicity for herself and to turn herself into a public figure. As such, she should expect to be held accountable to

a higher degree of scrutiny into her claim of expertise and inconsistent, revolving narrative. I do not believe that someone claiming to be innocent of appropriating another woman's lived experiences would be concerned about how her words might be "twisted". If Elizabeth was truthful and had the proof to back up her claims, there would be no way her words could be "twisted" – there would be no holes in her story and she wouldn't have to thread so carefully in her choice of words.

395. If Elizabeth's story was not deceptive and inconsistent, she would not need to edit, modify and adjust her linguistic phraseology and inconsistent narrative, such as answering a question on Reddit about whether White Lies was actually based on my life with the ambiguous phrase "*What I shared with filmmakers is 100% my own*", or changing a phrase made before litigation commenced, such as "I was a high school student when I joined the HF" to "I was *introduced* to the HF as a high school student" after litigation started, or "I was the only white girl in class" to "I *felt like* I was the only white girl in the class" at paragraph 64 (b) of her affidavit. Most residents of the greater Toronto area were "introduced" to the Heritage Front by watching violent clashes between the HF and ARA on the six o'clock news, or reading about the Front in newspapers. This does not mean all Torontonians who were thusly "introduced" were members of the Front. If you are telling the truth, you have no reason to be afraid of how your narrative might be "twisted" and called out as a lie.

396. In her January 2019 appearance on CTV's The Social, Elizabeth made a haunting comment: "*If you say a lie often enough, people will start believing that elephants are large pigs*". I believe this may be the truest thing she ever said. Perhaps Elizabeth thinks that if she says something enough times, people will start to believe it – but this does not make it true. Saying it is not living it. Since 1995, Elizabeth has systematically used the media and people in authority to fabricate a life which she did not live. I do not believe it is statistically possible for Elizabeth to have also been a disenfranchised teen who grew up in a trouble home, the only white girl in her peer group, who joined the Heritage



Front, became a spokeswoman, spent four months secretly talking with an anti-racist activist, attempted suicide, defected at great personal risk and still managed to shut down the group, then became both Jewish and gay. It may have been a freakish coincidence if our experiences occurred concurrently, but they did not – over and over again, Elizabeth claimed to have experienced events that I had *already* lived through years earlier and recounted on the witness stand, in a courtroom, on TV, in a documentary film and in newspapers. Experiences I was forced to relive because Elizabeth decided to use my life as creative inspiration and used unsuspecting journalists to fabricate a paper trail. I can prove that I lived through that traumatic time; I have the emotional scars and the historical records to prove it. She does not – because the entire foundation of her narrative is a lie.

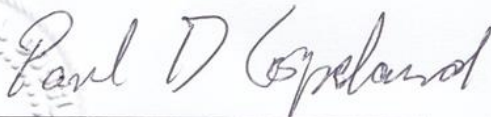
### **Court Intervention is Necessary**

397. The crux of my lawsuit rests upon the question of what makes an individual a unique person in the eyes of the law. It centers on the individuality of a human being, and the question of appropriation of one's likeness, without permission, for the exclusive material benefit of another. I realize that there are not a lot of precedents when it comes to the tort of appropriation, and it is precisely because of this lack of precedents that I ask the courts to deny the Motion for a summary judgement so that my case has a chance to be examined in-depth and in a trial setting.
398. **An artist's song or a writer's book is their intellectual property; I could not, for example, take CBC's "White Lies" and sell it as my own product because it would violate copyright law. And yet the film producers took my life from public record, reenacted it and sold it legally as their own product. By working with those producers, and representing herself as the exclusive source of the "true story" it was inspired by, Elizabeth Moore was effectively able to steal my life.**

399. From what I have learned about the justice system in Canada, identity theft is defined as someone using your name and likeness for illicit motives. For \$137, anyone can legally change their name – but the essence of your identity and likeness is not mutable or changeable because it is made up of unique lived experiences that make up the fabric of who you are. I believe that human beings are more than a name - that, in fact, we are the combined product of our life experiences.
400. The sum total of who I am is not just my name - it is the combined sum of my lived experiences: my trauma, my courage, my fears, my faith and religious identity, my troubled youth and formative experiences, the events that I lived through and survived, the threats I endured and the challenges I've had to overcome. All of these experiences form my identity.
401. Elizabeth Moore and Bernie Farber did not shut down the Heritage Front, but Farber used my name on The Agenda with Steve Paikin to conflate my story with Elizabeth's in order to give the false impression that she had shut down the organization. Elizabeth represented my lived experiences as her own in countless interviews and on her website, while profiting financially and via enormous media publicity. Elizabeth also used White Lies as a medium to conflate my lived experiences with hers, and then promoted the film as exclusively based on her life up to and including 2019.
402. Although Elizabeth Moore may not have used my name when she cherry-picked events from my life to represent and market as her own, she appropriated the indelible likeness and experiences that form who I am as a unique human being. And by deliberately helping herself to these indelible parts of my identity, she not only profited financially but also took my self-worth, my faith in justice and the law, and the thing that I was most proud of in my life - the fact that as an 18-year old teenage girl with no supportive family, no well-connected friends and no government protection whatsoever, I risked my life to successfully shut down the most violent, dangerous white supremacist organization in recent Canadian history.

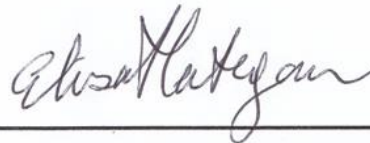
403. I do not believe that Elizabeth Moore has established a career that does not consist, at least in part, of incorporated elements of my lived experiences. I believe that Elizabeth's entire career and reputation has been built on a predatory appropriation that started in 1995 and continues to this day. For twenty-four years, Elizabeth appropriated my likeness and personality without permission in film, interviews and numerous press articles, and was repeatedly endorsed and promoted by Bernie Farber, who materially benefitted from this lie, and his friends and associates. I am pleading with the Court to help me end this exploitation of my name, my likeness and my identity.

**AFFIRMED BEFORE ME** at the City of  
Toronto, in the Province of Ontario on  
August 20, 2019



Paul D Copeland

Commissioner for Taking Affidavits  
(or as may be)



Elisa Romero Hategan

**ELISA ROMERO HATEGAN**

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

**B E T W E E N:**

**ELISA ROMERO HATEGAN**

**Plaintiff/Defendant by Counterclaim**

**and**

**ELIZABETH MOORE FREDERIKSEN and BERNIE FARBER**

**Defendants/Plaintiff by Counterclaim**

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