



ONTARIO
Superior Court of Justice

[SEAL]

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

TORONTO

Small Claims Court

Claim No.

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

Address

(416) 326-3554

Phone number

Plaintiff No. 1

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

☐ Under 18 years of age.

Last name, or name of company Romero Hategan		
First name Elisa	Second name	Also known as Elisa Hategan
Address (street number, apt., unit) 30044 - 90 Copper Creek Drive		
City/Town Markham	Province ON	Phone no. 416-857-6814
Postal code L6B 0P0	Email address elisa@elisahategan.com	
Representative		Law Society of Ontario no.
Address (street number, apt., unit)		
City/Town	Province	Phone no.
Postal code	Email address	

Defendant No. 1

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

☐ Under 18 years of age.

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

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

REASONS FOR CLAIM AND DETAILS

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

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

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

Where?

When?

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


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

The plaintiff also claims prejudgment interest from December 8, 2025 under:
(Date)

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

and postjudgment interest, and court costs.

Prepared on: December 8, 20 25


(Signature of plaintiff or representative)

Issued on: _____, 20 _____

(Signature of clerk)

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

Schedule A attached to Form 7A

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

The Parties

2. The Plaintiff, Elisa Romero Hategan (“**Elisa**”) is a writer, freelance journalist and public speaker who resides in the greater Toronto area. Her articles have been published by Maclean’s Magazine, Global News, Canadian Jewish News, NOW Magazine, and other outlets. In 2019 she was nominated for a RTDNA award for a Global News article. As an expert on radicalization and political extremism she has been interviewed by news media including but not limited to the CBC, BBC, Newsweek Magazine, The Guardian, Toronto Sun, Toronto Star, Globe and Mail, Maclean’s Magazine, Canadaland, Huffington Post and others. She has provided consulting services and workshops to law enforcement organizations such as Ontario Provincial Police and the Probation Officers Association of Ontario, and participated in joint presentations alongside OPP and RCMP officers.

3. Elisa Hategan emigrated from communist Romania as a child, in 1986. In 1991, at age 16, she was recruited by Canada's largest white supremacist group in modern Canadian history, the Heritage Front, and became its female spokesperson. Two years later, at only 18 years old, Elisa defected from the group after spying on them for 4 months. She filed approx. 30 affidavits with Ontario Provincial Police and testified against 3 group leaders in court in 1994. Her testimony was cited by trial judge Tremblay-Lamer as being central to their convictions: *"I found Ms. Hategan very credible, candid, calm and patient during an intensive cross-examination. She has never contradicted herself, and her forthright demeanour and manner of expression left no doubt in my mind that she was credible. Such was the strength of her oral and affidavit evidence, that neither Mr. Droege's testimony or that of any other witness could refute or even seriously challenge it. Based on the evidence of Ms. Hategan alone, I am satisfied beyond a reasonable doubt that the defendants are guilty."*
4. Called a "hero" in the press but unable to enter the Witness Protection Program despite credible death threats, Elisa lived in hiding across Canada between ages 18-25, without police protection or familial support. A ninth-grade high school dropout from an abusive, broken home, Elisa was accepted to the University of Ottawa as a mature student, got through school on merit scholarships and working two jobs, and graduated *Magna cum Laude* in 1999 with a double major in criminology and psychology. She moved back to Toronto in late 2001, but never stopped worrying about her safety. She also retained a deep-seated fear of Toronto police – one of Elisa's 1993 affidavits resulted in a 14 Division constable being charged with discreditable conduct under the Police Services Act for being a Heritage Front member, purchasing their merchandise, and attending at least one KKK rally in Arkansas. This incident was reported in national news, and resulted in widespread criticism of TPS.
5. The Defendant, the Toronto Police Services Board ("TPSB"), is a civilian body that oversees the Toronto Police Service ("TPS"), and is at all material times responsible for the TPS. Its headquarters are located at 40 College Street, Toronto, Ontario M5G 2J3.

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

Overview and Chronology of Police Involvement

9. On November 29, 2023, 14 Division Toronto Police detective constable Diana Vigna (“**Vigna**”) left a voicemail for Elisa, instructing her to return her call. The following day, Elisa returned Vigna’s call and was informed that criminal harassment charges were being laid against her because she had purportedly disobeyed “multiple cautions and warnings” not to contact the complainant, Toronto lawyer Caryma Sa’d (“**Sa’d**”).
10. Elisa had **never received a single caution from police, or any warning instructing her not to email Sa’d**. Given her fear of police, and 14 Division in particular, Elisa would have immediately complied. When she attempted to tell DC Vigna that she was mistaken, Vigna 1) refused to believe anything other than what Sa’d had reported, and 2) refused to provide Elisa with evidence that she broke the law, specifically information about the “cautions” she purportedly “ignored”, which indicated to Elisa that Vigna was negligent in her investigation since the “numerous cautions” she

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

34. On the morning of January 16, 2025, Elisa was contacted by 14 Division police constable Jacob McNabb (“**McNabb**”) who left voicemails and sent an email instructing her to return his call immediately. Elisa’s lawyer, Megan Schwartzenruber, phoned him back on her behalf, since Elisa was experiencing an anxiety attack. McNabb informed Ms. Schwartzenruber that her client would be charged with two more counts of “fail to comply” – again, based on Sa’d’s word.
35. A new breach charge raised the possibility, however slim, that Elisa – who didn’t have a surety – might not be released after surrendering to police. Elisa told her lawyer that she hadn’t done anything wrong and wasn’t going to surrender to police and risk being held in pre-trial custody – instead, she would jump off the Leaside Bridge on the morning she was scheduled to turn herself in to 14 Division. Ms. Schwartzenruber pleaded with Elisa, trying her best to reason with her and reassuring her that she would do everything in her power to make sure that wouldn’t happen.
36. When Ms. Schwartzenruber pressed McNabb for the reason behind the decision, he told her that Sa’d was calling them so frequently and complaining so much, they “had to do *something*”. Sa’d herself has compared the amount of time she spends on the phone with “police from jurisdictions across the country” (reporting critics for criminal harassment) as “**a part-time job**”. Elisa asserts that the notion of telling Sa’d to stop calling 14 Division hadn’t been entertained; charging someone to placate Sa’d seemed the preferable option.
37. Elisa did not find out the full details of what led to this near-arrest until July 2025, when her Freedom of Information (“**FOI**”) request to Toronto Police Services was finally fulfilled after an inexplicable four-month delay and Elisa’s escalation. The reports she obtained reveal just how extensively Sa’d lied in attempts to have Elisa arrested for a third time. On Sa’d’s word, McNabb wrote that he was “*satisfied with reasonable grounds that Hategan had breached her release order on two separate*

occasions, August 2024 and November 2024” and that she operated a Twitter account called “Dreamer” and possibly other anonymous pages critical of Sa’d. **None of it was true.**

38. Elisa does NOT own, nor know who runs the Dreamer/@Focustnv or the @SP411 accounts on X, yet Sa’d has falsely communicated to police that she is responsible and connected to them. Their only common denominator is that they have posted legitimate criticism of Sa’d on social media.
39. Elisa had long relinquished ownership of a domain she purchased for Sa’d as a favour, two years earlier – “carymasad.ca”. Sa’d knew that the domain had been registered for only one year, since the **registration confirmation screenshots Elisa sent to Sa’d clearly show that Elisa did not tick the “Renew” box.** After the dissolution of their friendship, Elisa saw no reason to renew it. But McNabb never checked the identity of the current registrant. A basic WHOIS search would have confirmed that in January 2024 the domain had not been renewed by Namecheap (Elisa’s registrar of choice), and in April 2024 it was registered at GoDaddy. A production order would have confirmed that Elisa does not publish tweets from any other X/Twitter account except for her namesake, @elisahategan. And yet, McNabb was ready to charge her with TWO new counts of Failure to Comply, because Sa’d told 14 Division police that “*NO ONE ELSE would have ownership of the website, ONLY THE ACCUSED*”. And she was taken at her word again, as if a lawyer’s word is tantamount to law.
40. It was only AFTER Ms. Schwartzentruber fought back and provided irrefutable evidence that Elisa was NOT the domain owner (such as emails from Namecheap’s legal department), that McNabb – whose written reports clearly show he doesn't understand how internet domain ownership works – decided to check with a colleague, cyber-crime investigator Heroux (badge 7925). This colleague was able to clear up his confusion and explain that Elisa could not be running a website and domain that she had relinquished and allowed to expire a year earlier. If McNabb had performed a thorough,

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

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

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

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

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

45. On February 7 2025, the Crown prosecutor in Elisa's case, Maya Sengupta-Murray, finally spoke with Megan Schwartzenruber, Elisa's defence attorney. After a brief telephone call where Ms. Schwartzenruber communicated key facts about Sa'd's false claims and insisted on setting trial dates, Sengupta-Murray decided she would withdraw all charges against Elisa at her next scheduled court appearance on March 6. Nevertheless, Swartzenruber was adamant on booking a date for a judicial Pre-Trial, and scheduled it for the afternoon of March 3, 2025. On the morning of Monday March 3rd, three hours before the pre-trial was set to begin, Schwartzenruber phoned Elisa to tell her that Sengupta-Murray indicated she did not wish to proceed with a pre-trial and wanted to drop the charges immediately.
46. All charges against Elisa Hategan were officially withdrawn on the Wednesday, March 6, 2025. Ms. Schwartzenruber read a statement on court record conveying that Elisa's prosecution was baseless, that the Crown had had no prospects for a conviction, and that the inexplicable delays in providing the Disclosure materials had taken a significant toll on her client's mental health and wellbeing.
47. On March 7, Jennifer Evans – the woman stalked by Sa'd's boyfriend – publicly announced that Elisa would appear as a witness in the civil action between herself and Sa'd.
48. Immediately after Elisa's charges were withdrawn, Sa'd contacted 14 Division police to engage in talks with Vigna about getting a peace bond against Elisa. Sa'd brazenly lied to Vigna, claiming that Elisa had made "*immediate contact*" with her after her charges were withdrawn, an outrageous lie. In Fall 2025, Vigna would tell a 14 Division investigator appointed to research Elisa's complaints to the

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

49. **Elisa NEVER made “immediate contact” with Sa’d after her charges were withdrawn, and asserts that Sa’d should be charged with mischief and obstruction for this lie alone, on top of being charged for false police reports filed over a two-year span.** Elisa speculates that Vigna was particularly gullible and sympathetic to Sa’d’s lies – she never fact-checked the made-up “cautions” Sa’d accused Elisa of disobeying, nor spoke with Elisa, nor allowed Elisa the opportunity to defend herself before deciding to arrest her. Subsequently, she recycled Sa’d’s lies in her defence reply to a LECA investigation. Elisa believes that Sa’d considered Vigna a susceptible entry-point into TPS, a “friendly” contact she could tap and manipulate in order to enlist police to further intimidate Elisa.
50. Four days after Elisa’s charges were withdrawn, Sa’d perjured herself with a baseless 810 application for a peace bond against Elisa. Elisa doesn’t know if Vigna or her colleagues assisted Sa’d with the peace bond, or if Sa’d swore her Information before a justice of the peace. Either way, the application was accepted by the court – presumably because of Sa’d’s law license and the veneer of credibility it conveys – even though by that time Elisa had had no contact with Sa’d for nearly sixteen months.
51. Elisa had no idea that Sa’d had filed a peace bond application against her. She had not communicated with Sa’d since November 2023. She hadn’t been served with a summons either, before accidentally discovering her own name on the Ontario Courts docket *just hours before the hearing* was set to take place. On the evening of May 13, Elisa visited the website “ontariocourtdates.ca” and checked the

next day's Daily Court Lists, looking for Jennifer Evans' name. Weeks earlier, Evans had told her that Sa'd may have filed a peace bond application against her (although Evans had yet to be served). Elisa wanted to learn the courtroom number so she could attend by Zoom to support Evans. When she checked the docket, she was shocked to find her *own* name listed below Evans'.

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

BACKGROUND AND CONTEXT

The History between Elisa Hategan and Caryma Sa'd

53. Caryma Sa'd reached out to Elisa Hategan on X/formerly Twitter on [July 30, 2021](#), following an incident where Sa'd's attempt to host a public comedy show featuring controversial anti-mask, anti-lockdown public figure Chris Sky was met with outrage and backlash in the community. The ensuing brawl outside Sa'd's Chinatown Mall law office on Spadina Avenue inspired an article published by the Canadian Anti-Hate Network ("CAHN") that Sa'd believed was defamatory.
54. Elisa had previously engaged in civil litigation with CAHN Chair and co-founder Bernie Farber and another CAHN member, but her claim was unsuccessful and she lost a countersuit. At the time Sa'd contacted her with questions about her legal adversaries, Elisa was in the midst of trying to appeal the dismissal of her appeal due to time delays. She was also bound by a civil court-imposed gag order that prevented her from speaking about one of the litigants involved in the case. The only exception to the gag order was speaking with lawyers about the matter.

55. Sa'd, by virtue of being a lawyer, assured Elisa – through written Direct Messages (“DMs”) and verbally – that everything she shared was bound by solicitor-client privilege. Two years later, Sa'd would brazenly lie to Vigna, claiming that Elisa had contacted Sa'd *first*, to seek help in breaching a gag order and “get revenge” on her legal adversary, an egregious lie. The undeniable truth plays out in Sa'd's DMs and text messages to Elisa, which plainly show that Sa'd sought Elisa out, followed and friended her on X / formerly Twitter, sent her DMs, and repeatedly pressed her for compromising details and information on CAHN members that was not available online but was known to Elisa. At first Elisa hesitated, but Sa'd's reassurances convinced her that everything she told Sa'd was “privileged” and would be kept confidential. This turned out to be a lie too.
56. Sa'd used some of the “dirt” she obtained to wage a campaign against CAHN, which culminated in her own lawsuit, filed in July 2023. Sa'd's action against CAHN was dismissed in September 2023 as having "no reasonable cause of action and therefore no reasonable prospect of success". Sa'd's scandalous service attempt of CAHN Chair Bernie Farber at his house, which was filmed and posted on Sa'd's X account, resulted in a March 2024 finding by the Law Society of Ontario that Sa'd:
- a) failed to act with honour and integrity
 - b) engaged in harassing, and/or discriminatory conduct, and
 - c) engaged in conduct that tends to bring discredit upon the legal profession.
57. The connection between Elisa and Sa'd quickly progressed into a close friendship and working relationship. From 2022 to September 30, 2023, they were best friends who co-authored 12 articles that were published on Crier Media and in NOW Magazine, with 3 additional articles in progress. Elisa also published a positive op-ed about Sa'd on Crier and Dean Blundell's website. The majority of the articles were published under Sa'd's name only, with Elisa acting as ghostwriter and/or editor without a byline.

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

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

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

60. Sa'd's promises, combined with affectionate exchanges, strung Elisa along for over a year. Sa'd used Elisa not only as a ghostwriter and editor of articles, but as a mentor and personal advisor on a number of sensitive matters, fondly referring to her "my consigliere". With Sa'd using her as a sounding board in her quest to rebrand as a social media influencer and journalist, Elisa fielded Sa'd's worst ideas – she advised Sa'd not to publish video footage captured by her boyfriend while stalking and filming unsuspecting women from a distance, not to cause a public disturbance on New Year's Eve which might have led to criminal charges, and to refrain from posting interviews with neo-Nazis or videos mocking a woman who had just been assaulted.
61. Sa'd used Elisa's ideas and words (culled from emails and text messages) beyond just utilizing them in articles that garnered GoFundMe and e-transfer donations for her ghostwritten "journalism". She also repurposed them for social media captions, and regurgitated Elisa's lines in podcast interviews. Then she enlisted Elisa to do research, to review and opine on various Libel Notices and Statement of Claim drafts, and to help with a Law Society Benchers Campaign. In an incredible reversal of roles, Elisa Hategan – who has no legal training – even gave Sa'd legal advice about defamation, and proofed her articles to ensure that they were defamation-proof.
62. Sa'd also sought Elisa's company on out-of-town trips. During these trips, as well as on different occasions throughout 2023, Elisa was exposed to abusive behaviour by Sa'd's boyfriend. This abuse included screaming and shouting matches where Wasserman disparaged both Elisa and Caryma, calling them lazy, useless, and similar invectives. Noteworthy incidents occurred in North Bay, as well as during a drive back from a Peterborough protest in June 2023, where Wasserman started screaming at Elisa after she inquired about Sa'd's promise to sublet her an empty office space.

63. Sa'd confided to Elisa – in text messages – her decision to sue critics according to race and sex, for optics, sometimes without a cause of action, sometimes to extract “humiliation” or to ensure “libel chill” from her critics (in and around 2023 alone, Sa'd sued approx. ten people). Sa'd also confessed to Elisa that she wanted to enlist others in “a letter-writing campaign” to a critic's workplace. After filing several police reports against this man, Sa'd went on to file a peace bond application, which was dismissed after months of stress for the man and his spouse, and the financial burden of paying for a lawyer. Thereafter, Sa'd sued him and his employer for defamation in Small Claims court.
64. Just as how she would eventually lie to 14 Division police about Elisa, Sa'd claimed this critic was a “criminal harasser” and a threat to her and her office cats, and accused him of running anonymous Twitter accounts critical of her. In reality, there was zero proof that this man operated any of those accounts. Their civil matter was settled in June 2025, with Sa'd issuing a retraction that contained the admission that she had **“caused harm” to the man and his wife**.
65. Elisa asserts that 14 Division police should have looked at the history of copious police reports filed by Sa'd, which began in 2021 or earlier, which would have identified patterns of falsehoods. For at least four years, Sa'd has accused large numbers of people of the same crime – criminal harassment – because they dared to criticize her or her boyfriend on Twitter.
66. Between 2022-2023, Sa'd enlisted Elisa in researching her critics. Sa'd's *modus operandi* involved a two-tiered approach to dealing with critics, depending on whether or not they had assets. As soon as Sa'd and Wasserman took offence to comments posted online about them, they began researching all they could about the critic, enlisting Elisa and core members of Sa'd's fanbase. They scoured the internet for the critic's footprint and look at addresses using Google Maps. Sometimes Sa'd and Wasserman staked out an unsuspecting critic's residence in person to film their house and vehicle(s). If they had assets, Sa'd would send a C&D letter threatening to sue, which occasionally resulted in

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

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

The HateGate Fraud

68. On September 12 2023, Sa'd and Elisa published an 85-page investigative article titled "The [Hategate Affair](#)", which featured both their names as co-authors. The article was read by hundreds of thousands of people, if not millions, across Canada and internationally. Elisa authored two-thirds of the piece and edited the rest, with the express understanding that Sa'd would split all contacts and 50% of all donations and moneys that came from the article. Elisa reserved the Hategate domain URL and pointed it to a website Sa'd commissioned, which featured "[Make a Donation](#)" buttons. Sa'd used her popular social media accounts to solicit funding for "journalism". Sa'd collected thousands of dollars as a result. The money was collected through donation buttons, direct e-transfers to Sa'd's bank and PayPal accounts, GoFundMe pages, and other sources unknown to Elisa.
69. Despite Sa'd's promises, Elisa did not receive a cent of her share of the money. She was also not reimbursed for [travel expenses](#) after she accompanied Sa'd and her boyfriend on work-related trips, despite Sa'd having promised to cover transport costs. She was not even given the #Hategate tee-shirt

that Sa'd promised she would receive – Sa'd made-to-order only one tee-shirt, which she alone wore during podcast interviews and media appearances.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

AN AVALANCHE OF 14 DIVISION POLICE ERRORS

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

Occurrence Reports That Show Negligent Investigation

101. Occurrence Number: 23-2608706

AUTHOR: UMBRELLO, FRANCO

DATE: November 14, 2023

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

Lies / Errors in this Report

In this occurrence report, Umbrello:

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

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

102. Occurrence Number: 2023-2312449

AUTHOR: PILKEY, DIANA

DATE: Oct 10, 2023

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

Lies / Errors in this Report

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

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

103. **Occurrence Number: 2023-2312449**

AUTHOR: REINDERS, FREDERIK

DATE: Oct 14, 2023

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

Lies / Errors in this Report

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

104. **Occurrence Number: 2023-2842128**

AUTHOR: DI TOMMASO, GIOVANNI

DATE: Dec 11, 2023

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

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

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

Lies / Errors in this Report

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

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

AUTHOR: TYHURST, KEEGAN

DATE: Dec 12, 2023

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

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

Lies / Errors in this Report

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

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

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

AUTHOR: UMBRELLO, FRANCO

DATE: June 25, 2024

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

Lies / Errors in this Report

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

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

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

AUTHOR: MCNABB, JACOB

DATE: Jan 15, 2025

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

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

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

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

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

Lies/Errors in this Report

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

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

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

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

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

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

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

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

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

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

Errors in this Report Update

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

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

The Whitewashing of 14 Division Police's Negligence

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ERROR A: Background Details are Critical to this Case

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Toronto Police are Accountable for Elisa's Legal Fees

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

NEGLIGENCE

171. A breach of duty of care is the failure to uphold a legal obligation to take reasonable steps to avoid causing foreseeable harm to others. In a negligence claim, a plaintiff must prove a duty was owed, that the defendant's conduct fell below the standard of care expected of a reasonable person in that situation, and that this breach caused harm.
172. Toronto police are negligent in two respects: first, they arrested an innocent person following a negligent investigation (prong A). Then they let a criminal get away with a crime, when they failed to prosecute the woman responsible for Elisa Hategan's arrests, near-arrests, and ongoing malicious efforts to incite further prosecutions (prong B). A finding of guilt on either prong (A or B), or both prongs, is a finding of negligence. The Plaintiff relies on the following material facts in support of her claim of negligence:

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

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

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

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

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

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

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

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

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

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

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

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

- g) While LECA complaint investigator Mugford cited *R v Storrey* and *Dumbell v Roberts* to claim that police do not need to have a *prima facie* case to make an arrest, Elisa points out that **that there IS a *prima facie* case against Sa'd. It is unreasonable, negligent, and an egregious display of bias, for Toronto Police to arrest Elisa admittedly without having a prima facie case, yet ignore and refuse to investigate a case where THERE IS prima facie evidence to indict and convict Sa'd.** Sa'd has lied repeatedly to police about Elisa, which shows intent to deceive, and *must* be criminally charged for causing Elisa's wrongful arrests, and for harassment Elisa continued to suffer after they were dismissed.
- h) **Sa'd continued to aggressively pursue police to silence and frighten Elisa, well after the wrongful charges laid as a result of Sa'd's lies were dismissed.** In March 2025, four days after the dismissal, Sa'd lied to DC Vigna with the utterly false claim that Elisa made "*immediate contact*" with her. Sa'd falsely claimed she was so scared, she needed police assistance to get a peace bond against Elisa. **This is a bona fide, prima facia case of indictable mischief and obstruction of justice, as well as criminal perjury for swearing a bogus information and affidavit.**
- i) Elisa believes that a case can also be made for criminal harassment and intimidation of a justice system participant, because on March 7, Jen Evans announced that Elisa would be a witness in Sa'd v Evans.
- j) On September 2, 2025 – the same day her former friend, disgraced ex-lawyer James Bowie, was sentenced to 4 years in prison for threatening, extorting and harassing an ex-client – Caryma Sa'd, who exploited, defrauded, and intimidated prospective client Elisa Hategan, posted a photograph of herself on X, which shows Sa'd smirking as she looks out over Leaside Bridge. Sa'd's photo is captioned by the derisive message, "*Please keep bicycles and pedestrians off the highway.*" It was the very spot where Elisa had confided to Sa'd that she planned to jump.
- k) Elisa is convinced that **without police involvement and charges being laid against Sa'd, Sa'd's behaviour will escalate and place Elisa in danger.**

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

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

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

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

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

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

Victim and Villain – a Reversal of Roles

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

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

184. The decision made by that unsuspecting, young, second-generation female cop would trigger an avalanche of errors within 14 Division Toronto police. It would lead to Elisa's two arbitrary arrests, a near-third arrest, two years of sleepless nights, panic attacks and suicidal ideation, financial hardship, life-altering PTSD, and worst of all – the breathtaking, non-stop fear that at any moment of any day, police could show up on her doorstep to throw her in jail. All because Sa'd abused her authority as a lawyer to convince three Toronto Police officers – Vigna, Umbrello and McNabb – that she was trustworthy enough to skip a comprehensive investigation before making an arrest.
185. Elisa asserts that **it is shocking and unacceptable for Toronto Police to willfully turn a blind eye to Sa'd's criminal actions. Criminal laws should be applied equally to all citizens, and not be selectively enforced.** Wrongdoings perpetrated by police, members of the Court, or "influencers" and celebrities, should be as rigorously punished as those committed by offenders who don't have connections to media, police, the courts, or positions of authority. If anything, alleged wrongdoings committed by people appointed to powerful and influential positions should be *more* strictly scrutinized because of the power (and corresponding risk of abuse) wielded by those professions.
186. Elisa has been traumatized by Sa'd's actions and Toronto police's unmerited, bizarre servility to Sa'd, which came at the cost of depriving Elisa of her Charter Rights. It is a servility made all the more inexplicable because of how Sa'd and her boyfriend regularly use Toronto police as props to advance Sa'd's brand as an X / Twitter influencer. To that end, there is arguably no better example than what happened in January 2024, when Wasserman filmed a cop giving Tim Hortons Coffee to pro-Palestinian protesters. The video was clipped and spun to appear like Toronto cops were pro-Hamas, resulting in a groveling apology by Toronto Police Chief Myron Demkiw. Sa'd's video went viral and

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

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

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

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

An Insurmountable Conflict of Interest

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

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

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

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

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

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

Schedule “B”

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

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

TAB 1

LEGAL EXPENSES incurred between December 2023 – September 2025

LAW FIRM	DATE	AMOUNT	TOTAL inc. tax
Bottomley VanderHeyden	Dec 15, 2023 – April 2024	6800	\$ 6800
Rudnicki Law	July 23, 2024	500	\$ 565
Cooper, Sandler, Shime & Schwartzentruber LLP	Aug 29 2024 – April 2025	22,300	\$ 22,300
Removal of Biometric data from CPIC – paid to Cooper, Sandler, Shime & Schwartzentruber LLP	August 5, 2025	500	\$ 565
			\$ 30,230

PLEASE NOTE

These expenses include retainers, monthly incurred billings, and consultations with 3 law firms.

I will provide official monthly PDF invoices from the law firms to the Court directly.

I am not attaching them here due to confidentiality issues – some of the itemized hourly billings describe solicitor-client privileged meetings, and the invoices list bank transfer information that I am not comfortable sharing with strangers.

TAB 2

CARYMA SA'D – Lies to Police October 2023 – July 2025

Top 10 Most Incriminating Lies about Elisa Hategan (out of 100+ lies disproven by verifiable records and SA'D's own text messages)

Tab	LIE DESCRIPTION	Notes	Date / Location
1	Ignored multiple police cautions and warnings	SA'D repeatedly lies to 14 Division Police, claiming I " dismissed multiple cautions and warnings " not to contact her. I never received any cautions or even <u>one</u> message from SA'D telling me that my messages were unwanted.	Oct 5-14 – Nov 2023 TPS Reports
2	<p>"Joked" about poisoning her office cats</p> <p><i>See Tab 16 on page 12 of this document</i></p>	<p>When asked if she fears for her safety, SA'D lies to police, claiming I "joked" about "slipping something under the door" to poison her office cats.</p> <p>Text messages (08/24/2023) from SA'D prove SHE came up with the idea of poisoning cats. I was horrified and reassured her it would not happen.</p> <p>SA'D used the "poisoning cats" lie to file bogus TPS reports and peace bond applications against at least 4 other people (Josh CHERNOFSKY, Gisela MCKAY, Catherine CROCKETT and Keven AGES). SA'D's text messages provide evidence of SA'D lying about "fearing for her safety" in relation to <u>2 other women</u> reported to TPS in 2023 (Melayna WILLIAMS, Deana SHERIF).</p> <p>SA'D lies about being "afraid for her safety" – In a Jan 2023 text message, SA'D and I discuss her adding the sentence "<i>I'm afraid for my safety</i>" to a letter she sent to Melayna WILLIAMS' aunt, Liberal Minister Marci Ien, as a tactical ruse to add credence and weight to her complaint. In the final draft, SA'D added a lie about having "<i>genuine concern about my own safety and security</i>." SA'D told me she called police on WILLIAMS multiple times because she tweeted comments SA'D thought looked bad for her "brand".</p> <p>SA'D DM'd me after harassing people she reported to TPS for harassment. She said they were "soft" & "scared", "crybabies". She wanted to "destroy" critics, get revenge on them, and make them "shit bricks" until "nobody will be comfortable walking my streets". She texted me "Honestly it's like tricking sheep. Except sheep are smart enough to fear the sheep dog".</p>	<p>Oct 14, 2023</p> <p>AXON Video</p> <p>(23:48 mark)</p>

3	<p>Committed hate crimes and firebombings</p> <p><i>See Tab 24 on page 16 of this document</i></p>	<p>SA'D's lies are disproved by 1990s court records. SA'D read my memoir and legal files. She <u>knows</u> I was exonerated of hate crime accusations. In 1994, the <u>Crown prosecutor made a statement</u> attesting my innocence. <u>Witness affidavits</u> confirm it. SA'D <u>knows</u> I never participated in <u>firebombings – we texted about 1990s events</u>. Yet SA'D persisted with falsehoods in order to depict me as dangerous & bolster false claims of fearing for her safety.</p>	<p>May 28 2024 54-page Letter to Police</p>
4	<p>Failed to comply / breached bail conditions by making direct AND indirect contact with SA'D</p>	<p>After I was arrested & charged with criminal harassment on Dec 10, 2023, I posted on X (formerly Twitter) about what happened. There were NO conditions to prevent me from speaking <u>ABOUT</u> SA'D. My only conditions were not to make direct or indirect contact with her. And I never did.</p> <p>My last contact with SA'D was in November 2023. Since then until now, I have never addressed SA'D directly, or asked anyone to pass on a message.</p> <p>Starting Dec 11, 2023 (the day after my 1st arrest) and up until mid-2025, SA'D repeatedly reported me to police for “breaching” my conditions.</p> <p>SA'D lied to police, telling them I made both direct AND indirect contact with her, because I gave witness evidence to a <u>woman stalked by SA'D's boyfriend</u>, and because I tagged the Law Society of Ontario (LSO) to tell them that I was exploited and defrauded by SA'D.</p> <p>SA'D also lied when she told police that I tweeted DIRECTLY to her on X/Twitter, which is <u>impossible</u> because of the Block feature. SA'D admits she BLOCKED me, and I blocked her in October 2023. If you BLOCK another person on X, the other person CANNOT communicate “DIRECTLY” with you.</p> <p>Tagging the Law Society of Ontario (LSO), a professional regulator, to report being victimized is NOT indirect communication, because: a) I did NOT ask the LSO to pass on a message to SA'D (no indirect communication), and b) I did not tag SA'D in my tweets (no direct contact). Reporting a crime does not mean you are contacting the criminal directly or indirectly.</p> <p>Giving witness evidence to a woman <u>stalked by SA'D's boyfriend</u> is NOT direct OR indirect contact with SA'D – yet she reported me for a breach. As a result of SA'D's boldfaced lies, on June 26, 2024 I was arrested for a second time and charged with Fail to Comply.</p>	<p>Dec 2023 – June 2024</p> <p>Multiple TPS Reports +</p> <p>May 28, 2024 54-page Letter +</p> <p>June 18, 2024 Email</p>

5	<p>“Slander” = criminal harassment</p>	<p>SA'D told police that I lied about everything I said about her. She claimed that she <u>didn't defraud me and owe me money</u>, didn't file <u>bogus lawsuits</u>, didn't <u>stalk people</u>, and didn't persuade me to <u>give her my Ritalin</u>. SA'D repeatedly urged police to arrest me for “<u>slander</u>” as criminal harassment.</p> <p>Our text messages between 2022-2023 irrefutably verify my statements.</p>	<p>2023 – 2024</p> <p>Many reports</p> <p>May 28 2024 letter to TPS</p> <p>June 18 Email</p> <p>June 5 Email</p>
6	<p>Contacted her first, to enlist her help in violating a Superior Court civil gag order and to “destroy” another woman – an illegal act</p> <p><i>See Tab 25 on Page 21 of this document</i></p>	<p>SA'D lied to police, telling that I reached out to Dean Blundell to get her info, and then contacted her to get help in breaching a civil court gag order, an illegal act. Then I insisted she produce a podcast about my story.</p> <p>Our DMs show that <u>SA'D contacted me first – she followed me on Twitter, slid into my DMs, told me she got my name from Dean Blundell, and pestered me for info on Canadian Anti-Hate Network (CAHN) members.</u></p> <p>SA'D wanted compromising information after CAHN published an article critical of SA'D. I had previously sued the people she was curious about, but due to a gag order, I couldn't talk about it except to lawyers. SA'D reassured me – TWICE in writing, and in person – that all our <u>convos were privileged</u>. That's how she gained access to my legal files. Some of that information would be leaked online by SA'D's client and accomplice MaryAnn WATSON.</p> <p>The podcast was entirely SA'D's idea – the first time she told me about it was on <u>Oct 15, 2022, by text message</u>.</p> <p>Over the next 1.5 years, I told her several times that I didn't want us to get in trouble with the gag order. I also asked her to <u>stop raising my hopes up</u>, because it was too hard on me emotionally – only to have her double down on her promises: she insisted the project was a definite go, told me she <u>wasn't bound by a court order</u>, and wanted to “<u>fuck up [my] enemies</u>”.</p> <p>To prove her interest, <u>SA'D sent me handwritten notes</u> about the segments she planned to cover in her podcast, and texted me for months on end.</p>	<p>Oct 2023</p> <p>May 28 2024</p> <p>54-pg Letter to Police</p> <p>Chart #2</p> <p>June 18, 2024 Email</p> <p>Multiple TPS Reports</p>
7	<p>Failed to comply / breached conditions by posting about SA'D on social media</p> <p><i>See Tab 91 on pages 40-41 of this document</i></p>	<p>SA'D lied to 14 Division cops, telling them I operated anonymous social media accounts (on X and LinkTree) that I don't own (and don't know who does), and own internet domains I <u>do not</u> own.</p>	<p>Fall 2024 – Jan 2025</p> <p>TPS Reports</p>

	<p>Lies re expired domain: <i>“NO ONE ELSE would have ownership of the website, ONLY THE ACCUSED”</i></p> <p>Seeing “Dreamer” X account on my phone</p> <p>“The complainant provided me with information that was uploaded onto evidence.com, including messages from a twitter account Dreamer, which she suspects to be HATEGAN. She had advised me that she observed that name on her phone previously,I was not advised of a date or location”</p>	<p>She told police that <i>“NO ONE ELSE would have ownership of the website, ONLY THE ACCUSED”</i>.</p> <p>SA'D also lied about “seeing” me using X account Dreamer/@Focustnv on my phone – an egregious lie. When 14 Division DC McNabb asked SA'D for date/time she had supposedly seen this, she couldn't give an answer – because it's a total fabrication and it never happened.</p> <p>I was told that I would be charged for a third time. Forced to pay \$3000 in legal bills for my lawyer to argue with McNabb for a week, until he decided to look closer at the “evidence” and concluded that there was no evidence of any wrongdoing and I “was not arrestable”.</p>	
8	<p>“Threatened, harassed and “hunted” SA'D's client MaryAnn WATSON” – a Victoria, BC woman who incited violence against me and published intimate information I shared only with SA'D in solicitor-client privileged conversations</p> <p><i>See Tab 24 (page 18) and Tab 84 (page 37) of this document</i></p> <p>Note: In May 2025, Victoria BC police visited WATSON in connection to a Peel Regional Police investigation I assisted in, which led to the arrest of SA'D's boyfriend Adam Lee WASSERMAN in May 2025 for Obstruction (after he gave Peel Police a fake name/DOB following an arrest for assaulting a senior citizen in April 2025).</p> <p>Victoria, BC Police reported that WATSON has “severe mental issues”.</p>	<p>SA'D's client/fan MaryAnn WATSON harassed & threatened me by urging the public to carve swastikas into my face. On March 15, 2024 I reported WATSON and “Lee Stevenson” (whose real name I learned was Adam Lee WASSERMAN) to York Regional police – see YRP Report no. 2024-80255.</p> <p>I reported them because WATSON's X/Twitter account @SeriousMother harassed me, incited violence against me, and spread privileged, intimate materials that I only ever discussed with SA'D and her boyfriend – they must have passed it to WATSON to disseminate. She is SA'D's accomplice.</p> <p>Before going to police, I sent a Cease & Desist notice to the Facebook accounts of WATSON, her husband, and adult sons, but received no reply and the harassment never stopped. My Cease & Desist note stated that if Watson didn't stop harassing me, I would sue for libel and/or go to police.</p> <p>Two months later, SA'D lies to 14 Division TPS that I “threatened” and “harassed” WATSON with my Cease & Desist notice – to cover up for WATSON's criminal harassment and incitement of violence against me.</p> <p>In her May 28, 2024 54-page letter to police, SA'D falsely claimed I had “threatened WATSON and her family”, that I was “hunting” WATSON, and I posed a threat to “crash” the funeral of WATSON's mother-in-law.</p> <p>SA'D's lies were fabricated <u>two months AFTER</u> I reported Watson and Sa'd's boyfriend to York Regional Police.</p>	<p>May 28 2024</p> <p>SA'D 54-page letter to TPS</p>

9	<p>SA'D told police her BF, Adam Lee WASSERMAN:</p> <p>A) Is a pacifist with no social media presence</p> <p>B) Was not involved as a third-party in "fallout"</p> <p>C. Never hacked our communications</p> <p>D. Never sent me any emails from her law office email account or other accounts</p> <p>E. Sa'd tells police she doesn't know anyone named Adam at her mother's house.</p>	<p>A) <u>WASSERMAN is a convicted career criminal</u> who <u>JOINTLY operates</u> the X/Twitter account @Carymarules with SA'D, along with other socials. He is the Owner/CEO of <u>SP411.cc</u>, a prostitution industry website with social media accounts. SA'D admits she <u>co-owns/co-runs accounts with him</u>. WASSERMAN has a significant social media presence – on SA'D's accounts, through his footage, and through aliases.</p> <p>B) SA'D apologized for his behaviour in text messages to me. WASSERMAN has a <u>history of hacking correspondence and blocking me</u> against SA'D's will. <u>WASSERMAN himself published an Oct 7 2023 article</u> admitting that HE, initially <u>against SA'D's will</u>, blocked me & gave an ultimatum: me or him</p> <p>C. SA'D and I text-messed about his email hack in <u>June 2023</u> & <u>Sept 2023</u></p> <p>D. I have several <u>emails and DMs signed "Lee"</u>, sent from SA'D's Sadvocracy email account, and her Twitter inbox. I also have <u>SA'D's text message apologies</u> for his abrasive messages.</p> <p>E. An egregious lie – Adam Lee WASSERMAN has been SA'D's boyfriend since 2016. He has visited her mother/family's house countless times.</p>	<p>Oct 14 2023 AXON Video 8:14 – 10:40 mark</p> <p>May 28 2024 54-page letter to TPS</p>
10	<p>- <u>Incited Hatred and Violence</u> against her</p> <p>- Conspired with her other critics, who she previously reported to police for "harassment"</p> <p>SA'D told 14 Division I incited violence against her</p> <p>SA'D reported me to Toronto Hate Crimes Unit for "inciting hatred and violence" against her</p>	<p>SA'D lied to <u>both</u> Toronto 14 Division Police AND Toronto Hate Crimes Unit</p> <p>Told police that I gave her mother's address to her enemies, and that I "worked with" them to "stalk" her mother – a revolting lie. I NEVER gave SA'D's family address to anyone. I am not part of a conspiracy to "slander" her. The ONLY thing in common between me and the strangers she accuses me of "conspiring with" is we have all criticized Sa'd online. SA'D reported countless people who posted fact-based criticism as "criminal harassers".</p>	<p>2024 – 2025 Multiple TPS Reports May 28 2024 letter to TPS June 18 Email June 5 Email</p>

See also:

Baseless Peace Bond Application – March 10, 2025. Thrown out of court at Crown's request on May 15, 2025. (I don't have a copy)

False Wellness Check with TPS and YRP involvement – July 11, 2025. In revenge for an article I published on July 10, one day earlier, SA'D calls 911 and lies to police, telling them that an incident that took place in January (seven months earlier) was an immediate threat.

Timeline of Lies / False Reports by Caryma SA'D to Police: October 2023 – July 2025

Tab	List / Description of False Statements	Notes	Location	Date
1.	<p>Caryma SA'D (DOB May 8, 1989) begins to call police on Oct 1, 2023 to request "wellness checks" on me, knowing it will trigger anxiety & panic attacks in me because of my phobia of police (even though I don't have a criminal record). By Oct 4, SA'D reports me for "criminal harassment" and files multiple false police reports for the next 2 years. SA'D leverages her status as a lawyer for credibility, and uses her law license as a shield. In 2022, when we were best friends, I told SA'D (in text messages + verbally) that if I was ever arrested for anything, I would kill myself. She also retweets a client who urges the public to "keep calling 911" on me – this client harasses me for a year & threatens me with violence.</p>	<p>SA'D knows that I have a police phobia, which started during my childhood in communist Romania and got worse in my teenage years.</p> <p><u>Screenshot of 2022 text message where I tell SA'D that if I was ever arrested, I would kill myself.</u></p> <p>For the next two years, SA'D would lie to police repeatedly in efforts to induce a suicide-by-cop.</p>	<p><i>Multiple TPS reports: 14 Division Police / York Region Police involvement</i></p>	Oct 1-2, 2023
2.	<p>SA'D begins to report me to Toronto police for "criminal harassment": "SA'D advised officers that after a falling out, SA'D emailed HATEGAN stating she no longer wanted communication between them and no longer wanted to work with her."</p> <p>THIS IS A LIE.</p> <p>SA'D sent me a single email on October 2, 2023, telling me she no longer wanted to work with me. She did <u>NOT</u> state that she "no longer wanted communication". I found it confusing, because two days earlier she had <u>pleaded with me to keep working</u> with her.</p> <p>There was no "falling out". On Sept 30, 2023, I was blocked abruptly and without explanation by SA'D's ex-con boyfriend, Adam Lee WASSERMAN (DOB 12/20/1979), on SA'D's phone and social media</p>	<p>On Sept 30, less than 24 hours before her boyfriend blocked me without warning, SA'D sent me an affectionate email pleading with me to continue working with her, telling me she knew "how good she has it" because I was in her life.</p> <p>Days earlier, SA'D apologized profusely for her boyfriend's <u>unsolicited and abusive emails</u> to me – see SA'D's text messages.</p> <p>Twelve hours after her <u>affectionate</u> email, she started calling 911 on me.</p>	<p>TPS Report 023-2312449</p>	Oct 4, 2023

	<p>accounts, after being defrauded by SA'D for a year. Just 12 hours before the sudden block, <u>SA'D pleaded with me to keep working with her.</u></p> <p>WASSERMAN has a history of hacking our communications in jealous rages. WASSERMAN blocked me twice before in 2023, resulting in SA'D and I communicating behind his back. See <u>June 2023</u> & <u>Sept 2023</u> texts.</p> <p>Previously, SA'D apologized profusely for his behaviour and blocks.</p> <p>Between Sept 30 and Oct 4, I sent SA'D approx. 5 emails asking what was going on. SA'D owes me <u>thousands of dollars</u> in earnings and donations for our journalism work.</p> <p>I was also in the middle of a work project SA'D had contracted me to do that week and didn't know what to do. <u>SA'D failed to pay me \$250 or reimburse travel expenses, as promised in Sept 25, 2023 text messages.</u></p> <p>Instead of paying me my earnings or telling me WHY I was blocked, SA'D contacted police immediately in overt efforts to build a case against me for "criminal harassment".</p>	<p>DC REINDERS' Notes: <u>"Seems Caryma more concerned about her reputation than any threats of harm to self"</u>.</p> <p>On October 7, 2023, WASSERMAN publishes a defamatory Substack <u>article where he admits that HE was the one who blocked me</u> – initially against SA'D's wishes. He admits that he gave SA'D an ultimatum to choose between me or him.</p> <p>WASSERMAN lies in his article about <u>prescription drugs SA'D took from me</u>, and discloses solicitor-client privileged conversations between me and SA'D. As a result, I email her about his lies and libel – she reports this to TPS as "criminal harassment".</p>		
3	<p>SA'D Email to Toronto 14 Division police from SA'D:</p> <p>"Elisa Hategan continues to communicate <u>directly</u> with me on social media, despite the issuance of a caution. She continues to fixate on my partner and portrays him in a false, negative light. Her tone ranges from desperate to demanding. I have <u>not unblocked</u> Ms. Hategan at any point. She is naming and tagging me even though I have made it clear that I wish to be left alone. I am concerned that she is ignoring the <u>caution</u> issued by police."</p>	<p>I never received a <u>single</u> message from SA'D to stop contacting her.</p> <p>There were NO cautions or warnings from police.</p> <p>It is <u>impossible</u> to communicate directly with someone on social media when blocked. SA'D states she did NOT UNBLOCK me, so it would be impossible for me to "communicate directly" with her.</p>	<p>TPS Report 023-2312449</p> <p><i>Quotes email from Sa'd</i></p>	Oct 10, 2023
4	<p>"The call text indicated this was related to a previously reported Harassment which culminated in a police caution to both parties to cease communication with each other".</p>	<p>I never received a <u>single</u> message from SA'D to stop contacting her.</p> <p>There were NO cautions or warnings from police.</p>	<p>TPS Report 023-2312449</p>	Oct 10, 2023

5	<p>“The call text indicated this was related to a previously reported Harassment which culminated in a police caution to both parties to cease communication with each other”.</p> <p>[...] “threats of information disclosure and public release were seen to have continued since the report date”.</p> <p>NOTE: The “threats of information release” SA’D reported to police consist of irrefutable proof that SA’D <u>defrauded</u> me, that <u>her boyfriend STALKED innocent women</u>, they <u>both trespassed onto private property</u>, convinced me to give her my <u>prescription drugs</u> and encouraged me to switch my prescription to a drug that SA’D preferred, initiated <u>malicious lawsuits based on race and sex</u> without any cause of action, and other actions that would likely lead to disbarment and criminal charges.</p> <p>SA’D lied to police repeatedly in order to silence me and stop me from disclosing what she did to me and other people.</p>	<p>This NEVER HAPPENED. NOBODY at 14 Division bothered to verify that this was true. As it turns out, it’s NOT true. But everyone believed SA’D when she lied that “multiple cautions” were issued. This error <u>led to my wrongful arrests/charges</u>.</p> <p>As for the “threats of information disclosure” – I am a WITNESS against SA’D. The information I disclosed consists of verifiable, irrefutable proof that SA’D DEFRAUDED me and that <u>her boyfriend STALKED innocent women – SA’D sent me the videos</u>.</p> <p>Since 2021, SA’D has made numerous false police reports about her social media critics, in persistent attempts to have people arrested for criticizing her “brand”.</p> <p>SA’D has written on X/Twitter that calling police is like <u>“a part-time job”</u>. NOBODY investigated her for lying / wasting law enforcement resources.</p>	TPS Report 023-2312449 Supplementa ry	Oct 14, 2023
6	<p>SA’D: “So. I’ve spoken with several officers ever since October 1st on this situation. Uh, and today I spoke with DC Vigna, who suggested putting in a new call as an update. This is a harassment situation.</p> <p>On October 4th, your colleagues were here and I laid out the situation for them. I believe it ended with them issuing a caution? I didn’t actually get a follow-up after that, but that’s what I UNDERSTOOD the course of action to be.”</p>	<p><u>Link to AXON VIDEO (GoogleDrive)</u></p> <p>SA’D lies about my messages being “harassment”, and lies about me having been cautioned by police.</p> <p>SA’D NEVER told me not to contact her, and NO CAUTIONS were issued.</p>	<u>AXON Video</u> 2:25 mark	Oct 14, 2023
7	<p>SA’D: “the caution didn’t work. I don’t think that she...took it seriously. I know that she is capable of following judicial orders, and in particular restraining orders or sorta injunctions. Uh....and that her....it’s not</p>	<p>SA’D lies about my messages being “harassment”, and lies about me having been cautioned by police.</p>	<u>AXON Video</u> 17:40 mark	Oct 14, 2023

	<p>abetting. I thought that, like we're now almost a week out, or almost 10 days actually, from when that caution was issued, and it's been daily."</p> <p>NOTE: SA'D intentionally mischaracterizes a civil court injunction as a criminal court "restraining order". She conveys the impression that my civil court gag order was issued by a criminal court – a very important distinction when police are trying to assess if someone poses a threat.</p>	<p>SA'D NEVER told me not to contact her. NO CAUTIONS were ever issued.</p> <p>A lawyer and member of Law Society of Ontario would know the difference between civil and criminal law.</p>		
8	<p>COP 2 (<i>reading email on SA'D's laptop</i>): "Who's Lee?"</p> <p>SA'D: Lee's my partner.</p> <p>COP 1: Ok. In this law firm? Or just..."</p> <p>SA'D: Um, yeah. Like... yes.</p> <p>9:18 mark</p> <p>COP 2: "I'm assuming prior to that, there was no..."</p> <p>SA'D [<i>vehemently shaking head</i>]: No email correspondence. Nothing.</p> <p>10:04 mark</p> <p>COP 2: And...are you aware if the same is true for Lee?</p> <p>SA'D: He does not have any social media presence. And doesn't –</p> <p>COP: ...Like the communications...</p> <p>SA'D: Yeah, yeah...no, so, like nothing. No emails, no nothing.</p> <p>He...doesn't wanna be involved in this. So that's why he's not here.</p> <p>COP: Was he involved in the previous...</p> <p>SA'D: He was not. No. Nope. No. He doesn't wanna be involved in any of this. He's more of a pacifist than me.</p>	<p>SA'D lies about her boyfriend's Adam Lee WASSERMAN (DOB 12/20/1979) being involved – in fact, there is solid evidence that WASSERMAN coached SA'D in how to lie to police. WASSERMAN was arrested/charged approx. 40 times over 2 decades, and is currently facing assault & obstruction charges. He spent multiple years in jail for robbery with disguise, conspiracy to commit an indictable offence, fraud, and criminal harassment (uttering threats). WASSERMAN was a fugitive with Quebec warrants for over a decade – his warrants were outstanding while dating SA'D, who knew of his past.</p> <p>He is owner/CEO of SP411.cc, Canada's largest prostitution review and advertising website. One sex worker claims he was a pimp.</p> <p>WASSERMAN sent me derogatory emails from SA'D's own law office email address, which contradicts her LIE to police that he was not involved and he sent "no emails, no nothing".</p>	<p>AXON Video 8:14 – 10:40 mark</p>	Oct 14, 2023

		SA'D WAS AWARE of his emails – she apologized for them in text messages		
9	<p>SA'D shows police her laptop computer screen:</p> <p>Obviously you don't have to read all of it, but if you wanna sorta peruse...all of this is either about me, or directly at me. I haven't bookmarked it to make a distinction. But if you kinda scroll, you'll see that sometimes I'm tagged, and then I untag myself in the conversation, uh so that I don't receive notifications.</p>	<p>LIE. It is <u>impossible</u> to communicate directly on X/Twitter after a Block. All communication between two parties is severed. SA'D would be unable to receive any notifications. It would also be impossible for me to "tag" her, or for her to "untag" herself.</p>	<p>AXON Video 10:40 mark</p>	Oct 14, 2023
10	<p>COP 2: So she was...was she a client of yours, or a partner? Like a...</p> <p>SA'D: When we initially connected, it was regarding a court case that she had been through. An outcome of that case was a very strict injunction slash restraining order, that prevented her from speaking about this other woman, referring to her, etcetera etcetera – except in the case of, you know, privileged conversations. So that is how we initially connected.</p> <p>And then developed a friendship – I would even say a "trauma bond" from there, because we've been harassed by some of the same people. Umm... So...you know, and that's partly why I'm not discussing this publicly – because... just out of an abundance of caution. Even though the majority of our conversations wouldn't be confidential or privileged, I...I just... why touch that, right?</p> <p>But she's...sort of weaponizing that against me. To say that, like, I can't talk about it. Which...may or may not be true. But I'm not talking about it anyway. But she thinks she has me by the neck, in that sense.</p>	<p>FALSE. SA'D's own text messages show that SHE initially approached me in July 2021 to ask questions about her enemies at the Canadian Anti-Hate Network (CAHN), who I sued in 2019. See July 30, 2021 Screenshot.</p> <p>I did NOT initially contact her to ask for help with my legal cases. SHE first followed me on Twitter and wanted info from ME – private info and dirt to build a case against CAHN. I told her I couldn't discuss my case except with lawyers, as legal advice – <i>see text messages.</i></p> <p>SA'D assured me that all our convos were privileged, to gain access to my info/legal files. She repeated her promise of privilege multiple times, until I gave her access to legal files & answered questions re. her enemies.</p>	<p>AXON Video 14:04 mark</p>	Oct 14, 2023
11	<p>COP: Ok. Now, when we put the pen to paper for this report, I guess for the supplemental report, what is it exactly would you like us to convey to DC Vigna?</p>	<p>FACT: I received NO cautions, and ZERO messages from SA'D to stop emailing her.</p>	<p>AXON Video 17:51 mark</p>	Oct 14, 2023

	<p>SA'D: That the caution didn't work. I don't think that she...took it seriously. I know that she is capable of following judicial orders, and in particular restraining orders or sorta injunctions. Uh....and that her....it's not abating. I thought that, like we're now almost a week out, or almost 10 days out actually, from when I...when that caution was issued, and it's been daily. Every single day there's references to me, messages directed at me, you know the email that was the one time, and...and this threat of more is coming, more to come. And it's....it's...very unsettling.</p>	<p>SA'D is reporting me to police for <u>TWEETING</u> about her. NONE of my posts are directed TO her because all communication ends after block.</p> <p>SA'D calls my civil court gag order a "restraining order" to imply I am dangerous. In fact, it is NOT a criminal restraining order.</p>		
12	<p>SA'D: And in particular, just with what's happening globally, the geopolitical context...I'm concerned that this puts a particular target on my back. She's Jewish, I'm Palestinian...and that was never an issue between us, but even like what's interspersed now in her Twitter feed. Like, she's referring to the conflict, and then it's me, and then it's you know about Gaza, and then it's a picture of me... and it's just...I don't know what the end game is here. I don't know what she wants from me. But I want nothing from her, nothing to do with her. And so I...you know...I...I feel scared. I feel scared about what she's capable of.</p>	<p>FACT: SA'D was born in Canada. She is not Palestinian.</p> <p>Her father left Palestine as a child and is a Jordanian-Canadian citizen. Her mother is Indian.</p> <p>Her claim is antisemitic & defamatory – that me simply being Jewish and tweeting about what she did to me "puts a mark on [her] back".</p>	<p>AXON Video 18:53 mark</p>	Oct 14, 2023
13	<p>COP 1: And what is she capable of?</p> <p>SA'D: [...] I know that she has this injunction and restraining order, so there's this pattern of behaviour. I know that she can hold on to things for a long time. And so you know...it...with the Heritage Front, I don't know...I can't say whether she was ever involved in incidents of violence or anything like that, I don't know, but just like...I don't know what she's capable of.</p> <p>[...] I do feel in some ways that I was targeted by her. And specifically sought out because of my profile, because of the work that I was doing as kind of a...a vehicle to get her story out there.</p>	<p>SA'D repeatedly refers to my civil court gag order as a "restraining order" while answering cop questions about whether I am DANGEROUS. She omits that it is a CIVIL gag order, NOT a criminal restraining order.</p> <p>SA'D LIES that I "specifically sought [her] out because of [her] profile". SA'D's own text messages show that SHE initially approached ME on July 31, 2021 to ask questions about her enemies at (CAHN), who I sued.</p>	<p>AXON Video 19:44 mark</p>	Oct 14, 2023

14	<p>SA'D: But she's done, or been involved with, dangerous stuff, <u>her whole life</u>. [22:25 mark]</p> <p>FACT: SA'D lies to police by telling them I was "involved with dangerous stuff" MY WHOLE LIFE. I was age 48 when this interview was recorded.</p> <p>The <u>only</u> time I was involved with a radical group was when I was a minor girl (ages 16-18), a period of only TWO years. At 18, I spied on the Heritage Front for 4 months, turned over 30 affidavits to the OPP, and testified in a trial that led to the convictions & jail sentences of 3 group leaders. The judge, Mme Danielle Tremblay-Lamer, credited my testimony for singlehandedly convincing her to convict them.</p> <p>I have a BA in criminology & psychology, and have worked with several agencies, global think tanks & law enforcement in counterterrorism.</p>	<p>FACT: SA'D lies to police by telling them I was "involved with dangerous stuff" <u>MY WHOLE LIFE</u>.</p> <p>SA'D knows my history very well – she researched my life extensively for a <u>podcast</u> she insisted she wanted to make about me. She watched videos about me, read legal docs, and wrote a <u>glowing 5-star Amazon review for my memoir</u>, calling me a "national hero".</p> <p>SA'D deleted her review one day after her lies led to my wrongful arrest.</p>	<p>AXON Video 22:25 mark</p>	Oct 14, 2023
15	<p>COP 1: Now. Since the last report, since October 4th, has she made any threats at you?</p> <p>SA'D: Um.... The email that I initially showed you...umm....and a couple of tweets...kinda alluding to, not physical threats but threats to my reputation, threats to my professional standing, threats to disclose personal or sensitive information. And I don't know specifically what she's referring to. But that's kind of like the...the looming threat.</p>	<p>SA'D is afraid I will disclose unlawful activity she and her boyfriend engaged in, such as convincing me to <u>give her my Ritalin prescription pills</u>, and her BF stalking Toronto women. SA'D sent me videos & photos taken by <u>WASSERMAN stalking a woman</u>. I gave the materials to their victim – I am her witness in a civil lawsuit.</p>	<p>AXON Video 22:40 mark</p>	Oct 14, 2023
16	<p>COP: Now, are you afraid for your physical safety?</p> <p>SA'D: Yeah. Yeah. She knows where I spend my time, she knows that like my cats are here. Alone. If I'm not physically in the office and you know, the door is closed, but it's not like....you could get...like...open it like...even when it's locked, you could kinda slip something in there....like, she knows that that's something I'm anxious about. She's joked about like, someone coming for my cats before, right? So I don't know if that's something she might actually execute.</p>	<p>FACT: This is an irrefutable LIE.</p> <p><u>SA'D HERSELF told me in text-messages</u> that her "enemies" could slip something under the door to poison her cats. I REASSURED her it wouldn't happen due to mall security.</p> <p><u>Screenshot of SA'D text messages</u> proves she used the "cats poisoning" line in police reports and peace bond applications against at least 3 people.</p>	<p>AXON Video 23:48 mark</p>	Oct 14, 2023

17	<p>SA'D: And this one's a bit trickier, at like...you can't control, obviously, other people reacting to what you're saying....uh, but in this document [she points to her laptop, which the cop is scrolling through] you'll see that, like, there is incitement against me. Based on what she's saying, how she's portraying herself as victim...</p> <p>[...] And that's just like one example of her whipping up this frenzy against me, that takes very little effort to do, because I have a lot of people who already don't like me"</p>	SA'D lies to police by telling them that me "portraying [myself] as a victim" – i.e. speaking out about how I was exploited and defrauded by SA'D – means that I am causing "incitement" and "whipping up a frenzy against" her.	AXON VIDEO 24:30 mark	Oct 14, 2023
18	"[SA'D] said that on October 4, 2023 SA'D made a report of a criminal harassment to Toronto Police Service (23-2312449). Officers later learned that investigation was cleared by way of caution. "	FACT: I never received a single message from SA'D to stop contacting her. Not <u>ONE</u> . There were NO cautions or warnings from police.	TPS Report <i>Initial Officer Report-1 by Ivanov, Nikita</i>	Nov 10, 2023
19	<p>"On and between September 30th 2023 and November 14 2023, the accused continued to try and communicate with the complainant through social media and numerous e-mails, even after being told by the complainant on multiple occasions that all communication was unwanted.</p> <p>Due to all the repeated communications and the accused dismissing the complainants demands to stop, the complainant has become fearful of this behaviour (CHARGE)."</p>	<p>FALSE. Toronto Police 14 Division:</p> <p>1) Failed to verify that the complainant told the accused that "all communication was unwanted" (SA'D NEVER told me anything)</p> <p>2) Failed to verify the accused actually "dismissed complainant's demands to stop". SA'D sent 0 "demands to stop"</p> <p>3) Failed to prove HOW an accused can communicate with SA'D on social media after being Blocked.</p>	TPS Report 23-2608706	Nov 14, 2023
20	<p>"SA'D told HATEGAN that she no longer wanted to speak with her. HATEGAN continued to communicate with SA'D against her wishes, and HATEGAN was eventually arrested on today's date.</p> <p>Information in the text of the call advised that SA'D wished to report that HATEGAN had breached her conditions of release by sending confidential information to a third party who had been posting it online.</p>	<p>SLANDER is not a criminal offence in the Canadian Criminal Code.</p> <p>The information I sent was evidence of criminal activity (stalking) by Adam Lee WASSERMAN, SA'D's boyfriend. I sent it to their stalking victim, Jen EVANS. I am her witness in a civil case</p>	TPS Report 2023-2842128	Dec 11, 2023

	At 22:45 hrs, HATEGAN had made several posts on X (formerly Twitter), recounting her relationship with SA'D and slandering her reputation by claiming that SA'D had been engaging in discreditable conduct in her profession as a juranlist (sic). Several other parties had gained access to private message conversations between SA'D and HATEGAN, which could only be accessed by HATEGAN and SA'D."	There were no release conditions preventing me from disclosing any kind of evidence. Speaking <u>ABOUT</u> my relationship with SA'D is NOT "Direct" OR "Indirect Contact" with SA'D.		
21	"the complainant stating to the accused that she no longer wanted communications between them" "Officers spoke with the complainant, who stated that she believed Elisa HATEGAN had breached her condtions (sic) not to communicate with her by posting "tweets" on SA'D's Twitter posts. "	FALSE. I never communicated with SA'D after November 2023, directly OR indirectly. We were mutually blocked. A BLOCK makes it <u>impossible</u> to contact someone on social media. I never received a SINGLE message from SA'D to stop contacting her. There were NO cautions or warnings from police.	TPS Report 2023-2858414	Dec 12, 2023
22	Letter from Law Society of Ontario (LSO) sanctioning SA'D for engaging in anti-Jewish harassment & conduct that brings discredit to profession	Link to LSO LETTER on Google Drive	Law Society of Ontario Report	Mar 24, 2024
23	Screenshots of text message by someone Sa'd sued in Small Claims court alleging Sa'd offered to drop her lawsuit in exchange for false testimony	SA'D offering to drop a lawsuit in exchange for false testimony is cause for disbarment		Spring 2024
24	<u>7-Page Cover Letter to police on SA'D Law Office stationary, May 28, 2024 (Letter is 54 pages in total)</u> <u>"SUMMARY FOR POLICE REPORT ON ELISA HATEGAN 23-2289886, 23-2312449, 23-2608706, 23-2842128, 23-2858414"</u> "Dear D.C. Vigna, Please find attached information for your consideration with respect to Elisa Hategan's ongoing criminal harassment . [...] I cannot emphasize enough how terrifying it is to be the object of fixation for a former confidante who is now hell bent on ruining my life.	FALSE. I am not "hell bent" on ruining SA'D's life because I spoke out about how she conned me into working for free for a year and defrauded me . Polygraph me. I never "conveyed a threatening message through a third party". SA'D has NO statement from any third party because it's a lie. My tweets were NOT derogatory, and speaking ABOUT Sa'd is NOT direct or	SA'D 54-page Letter to Police	May 28, 2024

	<p>Since her arrest, HATEGAN has fixated on me. She attended the University of Toronto protest encampment where I was known to be working and conveyed a threatening message to me through a third party.</p> <p>She posted approximately 138 derogatory tweets that refer directly or indirectly to me, my partner, and/or my clients. This does not include hundreds of reposts to amplify her own content. One tweet was direct communication and approximately 20 tweets constitute indirect communication.</p> <p>HATEGAN has a long history of harassing private citizens.</p> <p>HATEGAN intended to use me as a proxy to ruin her former best friend. When that failed, she turned her attention to harassing me, instead. <u>I do not believe she will stop on her own without police intervention.</u></p> <p>HATEGAN's ongoing actions constitute a sustained campaign of criminal harassment through false allegations, manipulation, threats, and the use of third parties. Her behaviour reflects a pattern of toxic emotional dependence, stalking, intimidation, and misrepresentations/lies aimed at damaging my personal and professional reputation and inciting others to harass me.</p> <p>[...] The case against her was withdrawn around the time she agreed to testify against her former associates.</p> <p>Previous Criminality: Involved in hate crimes and harassment campaigns.</p> <ul style="list-style-type: none"> •Fourth person in Ontario ever charged with willful promotion of hatred. •Trained and coached by CSIS operative GRANT BRISTOW in techniques to monitor, stalk, and torment targeted individuals as part of the "IT" Campaign. 	<p>indirect contact. Also not 138 – SA'D repeatedly posted the SAME tweets in her package to police, making it seem like I posted double the amount. Regardless, even if I tweeted 1000 times, NONE were contact w SA'D.</p> <p>FALSE. I do NOT have "a long history of harassing private citizens".</p> <p>FALSE. SA'D literally made up the line that I "intended to use her as a proxy to ruin a former friend". SA'D literally lied to police about how we met – <u>SHE reached out to me</u> to get dirt on her enemies. I didn't even want to talk about my lawsuit with her, much less "use her platform", until she repeatedly reassured me that our communications were <u>privileged</u>.</p> <p><u>SA'D told me she planned to make a podcast about me</u> – I never asked her. SHE wanted to destroy CAHN & its members after they criticized her. SHE text-messaged me about people she <u>wanted to destroy and get fired</u>.</p> <p>FALSE. The case against me as a teenager was <u>withdrawn</u> because I was innocent and there were NO prospects of conviction. <u>The Crown Prosecutor made a public statement in 1994 attesting to my innocence</u> – and witness affidavits prove my innocence. I never made <u>ANY</u> deals with police. SA'D KNOWS THIS. She</p>		
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<p>• Unsolved case involving a group home firebombed by the Heritage Front.</p> <p>Ingratiated herself with me to get me to enact vengeance by proxy on her former best friend. Reached out under the pretext of not being restricted by the injunction because she is permitted to discuss her case with counsel.</p> <p>Wanted to use my platform to circumvent the injunction. She wanted me to produce a podcast highlighting inconsistencies with MOORE FREDRIKSEN'S life story, with the aim of ruining her reputation. (This project never came to fruition.)</p> <p>Breach of Non-Communication Order – Direct Communication: On December 12, 2023, HATEGAN replied <u>directly</u> to me despite being blocked. She circumvented being blocked by posting under another account within a thread.</p> <p>Indirect Communication: Tagged the Law Society of Ontario (LSO) in fifteen tweets with false and salacious accusations against me, despite acknowledging she cannot or should not file a formal complaint while her charges are pending. HATEGAN is aware that I have previously been required to respond to an LSO complaint based on tweets tagging the regulator.</p> <p>Tagged my professional contacts, including LISA LAFLAMME, DEAN BLUNDELL, and CRIER MEDIA, in five tweets hoping they will address her allegations with me.</p> <p>Prior to her arrest, she communicated with BLUNDELL via direct message on X</p> <p>On May 7, 2024, after my footage of the University of Toronto's People's Circle for Palestine encampment went viral, she visited the campus and spread false rumours and salacious rumours to another journalist, DAVID MENZIES. On May 8, 2024, MENZIES informed me that she</p>	<p>researched my life, memoir and legal documents, & <u>love-bombed me while defrauding me.</u></p> <p>SA'D text-messaged me that SHE wanted to "<u>fuck up</u>" my <u>"enemies"</u> and specifically go after MOORE.</p> <p>I never "stalked" or "tormented" any individuals referenced by BRISTOW.</p> <p>FALSE. NONE of the things I ever said about SA'D are "false allegations, manipulation, threats, and the use of third parties." SA'D's own text messages to me PROVE she is lying.</p> <p>FALSE. SA'D KNOWS I was never involved in "hate crimes", or ANY <u>group home firebombings</u>. Media and news reports from the 1990s prove this is a brazen lie by SA'D, who called me a <u>hero</u> up to the day I was blocked</p> <p>FALSE. I NEVER "replied directly" to SA'D, on Dec 12 or at any other date – impossible to do given that we were <u>mutually blocked</u>.</p> <p>FALSE. Dean Blundell is MY colleague too. I had a preexisting relationship with Blundell and he followed me on Twitter <u>before SA'D contacted me.</u></p> <p>In Dec 2022 I appeared on Blundell's show. <u>In January 2023 BLUNDELL offered me a CRIER MEDIA contract,</u> which I didn't sign. I collaborated to Crier on an ad hoc basis. SA'D KNOWS</p>		
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	<p>threatened to retaliate once her charges are dropped. This was conveyed as, “She said you should know she will get you back.”</p> <p>Ongoing Criminal Harassment – HATEGAN responded to being charged with criminal harassment by spreading lies and half-truths to manipulate others and sway public opinion against me. This itself is harassment</p> <p>Misrepresentation and False Allegations:</p> <ul style="list-style-type: none"> • Exaggerates her influence on me. • Claims ownership of my project that she was invited to join. • Claims I owe her money. • Accuses me of lying to police and filing a false report. • Blames me for her old name appearing on charging documents. • Claims conspiracy with the crown and police. • Accuses me of spoofing her phone number. • Accuses me of inciting others to defame her. • Accuses me of malicious wellness checks. • Accuses my partner of intercepting my communications. • Accuses my partner of running an anonymous account. <p>Obsessive, Manipulative, and Threatening Behaviour:</p> <ul style="list-style-type: none"> • Tracks my social media activity, including deleted reviews and retweets. • Posts photos and videos imitating my actions or locations. • Publishes private conversations and documents and threatens to release more. • Hints at lengthy affidavits to expose my personal information. • Posts cryptic, intimidating messages targeting me and my partner. 	<p><i>this</i> – I told her about Blundell’s offer and contract. Our text messages prove that I knew Blundell long before SA’D first contacted me.</p> <p>FALSE. <u>SA’D owes me thousands of dollars & I own 50% of our project.</u></p> <p>FALSE. I did not go to the University of Toronto to “stalk” SA’D or “spread rumours” about her. I have lived and/or worked in the U of T / Annex area for over 2 decades – since 2001. My mother’s apartment was on Charles St, next to the campus. Also, my ex-partner works at U of T, and taught on campus for over 15 years. I regularly travel downtown with her.</p> <p>SA’D lied to police by telling them I “showed up at a location where she was known to be working” – SA’D does NOT work for U of T – but she met my ex-partner, and KNOWS that my partner works at U of T.</p> <p>I saw MENZIES and introduced myself to him as the principal author of The Hategate Affair, which he praised SA’D for authoring. I NEVER made the statement SA’D claims I did. I simply told MENZIES that I wrote the majority of Hategate and SA’D lied, and it would all come out in court. Then MENZIES gave me his business card. Why would MENZIES give his card to someone uttering threats?!</p>		
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	<ul style="list-style-type: none"> • Fabricates conspiracy theories to portray me as conspiring with police and the Crown, and my partner as an abusive pimp. <p>Use of Third Parties:</p> <ul style="list-style-type: none"> • Shared my mother’s home address with JOHN THIBEAU and is working with him to try and identify my partner, who they wrongly believe is named ADAM WATSON. • Shared partial DMs with DEANA SHERIF, as well as a twelve-year-old article which has been misrepresented online to falsely suggest that I am antisemitic. • Shared partial DMs with JENNIFER EVANS, which have been published online to falsely suggest that I engage in stalking and harassment. <p>Harassment of Third Parties:</p> <ul style="list-style-type: none"> • Targets my client MARYANN WATSON, who made a police report about HATEGAN’S suicide threats and harassing behaviour prior to HATEGAN being criminally charged. • Posts references to her former address and is searching for current address. • Sends threatening messages to her family. • There were concerns that HATEGAN would crash the recent funeral of WATSON’S Holocaust survivor mother-in-law, who endured five work camps including Auschwitz. WATSON’S name was not included in the obituary as a precaution. • HATEGAN has access to Jewish directories through her conversion and speaking gigs at synagogues.” <p>Since being arrested, HATEGAN posted approximately 138 derogatory tweets that refer directly or indirectly to me, my partner, and/or my</p>	<p>SA’D didn’t provide an affidavit from MENZIES to back up her lies because what she claims I said never occurred – and I’ll take a polygraph to prove it.</p> <p>FALSE. SA’D’s correspondence with police PROVES she stalks me regularly.</p> <p>FALSE. I never “imitated” SA’D. SA’D was <u>imitating photos</u> and <u>videos</u> I posted YEARS before I met her. Date stamps on my social media photos/ videos show they were published YEARS before SA’D imitated <i>me</i>.</p> <p>FALSE. I NEVER shared SA’D mother’s address with ANYONE. SA’D <i>literally</i> made this up. She cannot back up her boldfaced lie because it didn’t happen</p> <p>FALSE. I NEVER shared the 12-yr old article about SA’D with SHERIF or any radio host. <u>The 2012 article does NOT misrepresent SA’D.</u> It very accurately describes an incident where she planned to protest a Holocaust memorial event for survivors. SA’D <i>herself</i> text-messaged me about it.</p> <p>I don’t have access to “Jewish directories” – that’s just insane.</p> <p>FALSE. I never “fabricated conspiracy theories” about her, or accused her partner of being “an abusive pimp”. Everything I have ever said about SA’D and WASSERMAN is verifiably true and backed by evidence.</p>		
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<p>clients, including direct communication (one tweet) and indirect communication (approximately 20 tweets).</p> <p>HATETGAN (sic) also showed up at a location where I was known to be working and sought out third parties for the purpose of disparaging me. One individual subsequently conveyed her message to me.</p> <p>HATEGAN fits the profile of a stalker with severe personality disorders. She demonstrates an exaggerated feeling of self-worth and an obsessive desire for other people to admire and revere her. She also exhibits extreme dependence in her need for constant help, attention, and acceptance from others, as well as a high sensitivity to rejection and abandonment. Her pattern of behaviour includes hyper intimacy, cyber stalking, surveillance, <u>harassment and intimidation, and coercion and threats.</u></p> <p>I genuinely fear she may escalate to physical aggression.</p> <p>The impact of HATEGAN's stalking has caused me significant anxiety, distress, and a sense of powerlessness. Her attacks have disrupted my personal and professional life. Her collaboration with other online harassers involves disseminating my mother's address and targeting one of my clients.</p> <p>She is actively fabricating conspiracies that put me and my partner at risk of physical harm at protests.</p> <p>I also carry a lot of stress about third parties being harassed by HATEGAN due to their actual or perceived proximity to me, including my client whose name was omitted from her mother-in-law's obituary to minimize risk of the funeral being crashed.</p> <p>The severity of ongoing harassment highlights the need for additional charges, as well as conditions not to frequent anywhere I work, live, or am known to be.</p>	<p>FALSE. Information I shared with one of SA'D's victims was NOT "private", but consisted of videos and photos from Sa'd's own text messages, which showed her boyfriend stalking a woman named Jennifer EVANS.</p> <p>SA'D had sued EVANS for defamation in Small Claims Court because EVANS had accused SA'D and her boyfriend of criminal harassment and stalking. As a witness, I gave EVANS proof of WASSERMAN's stalking (videos and photos Sa'd texted me in 2023), and proof that SA'D <i>herself</i> had authored a defamatory article about EVANS. My evidence effectively destroys SA'D's case against EVANS, who was correct to suspect that she had been stalked.</p> <p>At that time there were NO conditions preventing me from speaking ABOUT Sa'd to anyone. Being EVANS' witness is NOT direct or indirect contact.</p> <p>FALSE. <u>SA'D love-bombed me for a year.</u> She told me she loved me on several occasions. She told me that I could call her "day and night". She encouraged me to be emotionally dependent on her – then lied to police about my "hyper intimacy", "stalking", "intimidation", "coercion" and "threats". SA'D provided ZERO evidence to police that I "coerced" or "threatened" her – but I can PROVE</p>		
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		<p>that she conned and defrauded me into giving her free labour for 1 year.</p> <p>FALSE. SA'D's client/fan MaryAnn WATSON harassed & threatened me by urging the public to carve swastikas into my face. On March 15, 2024 I reported WATSON and "Lee Stevenson" (whose real name I learned was Adam Lee WASSERMAN) to York Regional police – see YRP Report no. 2024-80255.</p> <p>I reported them because WATSON's X/Twitter account @SeriousMother harassed me, incited violence against me, and spread privileged, intimate materials that I only ever discussed with SA'D and her boyfriend – they must have passed it to WATSON to disseminate. She is SA'D's accomplice.</p> <p>Before going to police, I sent a Cease & Desist notice to WATSON, her husband, and adult sons (through Facebook), but received no reply and the harassment did not stop. My Cease & Desist note stated that if Watson didn't stop harassing me, I would sue for libel and/or go to police</p> <p>Two months later, SA'D lies to 14 Division TPS, telling them that I "threatened" & "harassed" WATSON in my C&D notice – to cover up for WATSON's criminal harassment and incitement of violence against me.</p>		
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		In her May 28, 2024 54-page letter to police, SA'D falsely claimed I had "threatened WATSON and her family", that I was "hunting" WATSON, and I posed a threat to "crash" the funeral of WATSON's mother-in-law. SA'D's lies were fabricated <u>2 months AFTER</u> I reported WATSON to YRP.		
	<u>47-Page Document containing 139 Items Chart</u> – attached to May 28, 2024 7-Page Email = Total 54 Pages of lies by SA'D			May 28, 2024
25	Chart #2: "HATEGAN initially reached out to DEAN BLUNDELL, asking him to put us in touch. HATEGAN asked me to listen to her story in my capacity as a lawyer so she would not be limited by the Superior Court injunction. HATEGAN spewed her entire history with Elizabeth MOORE, whose name was not familiar to me at that point. I did not provide any advice on appealing her civil loss. Shares private information; Retribution against Moore; Projects desire for vengeance"	SA'D's Text Messages prove that <u>SA'D was the one who initially contacted me on July 31, 2021, got my name from BLUNDELL</u> and reached out to obtain information on CAHN. SA'D lied when she told police she was "not familiar" with MOORE – In July 2022 SA'D tweeted screenshots of <u>DMs with MOORE on July 6, 2021 - 3 weeks before Sa'd 1st contacted me</u> <u>SA'D's early questions were about Moore</u> . SA'D pestered me for info on Moore & other CAHN members from July 2021 to Fall 2023.	<u>SA'D 54-page Letter to Police</u>	May 28, 2024
26	Chart #5: "HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction. Retribution against Moore"	SA'D's text messages <u>prove</u> that <u>SA'D came up with the idea of making a podcast about me</u> . It was 100% her idea. I NEVER asked her to circumvent any Superior Court injunction; SHE wanted to, and <u>bragged she didn't have to abide by any court order</u> .	<u>SA'D 54-page Letter to Police</u>	May 28, 2024

27	Chart #8: "HATEGAN falsely claims to have advised against engaging in troubling acts, suggesting that the ideas were serious, when they were not. Shares private information; Projects desire for vengeance; False claim – miscellaneous"	SA'D disclosed plans for actions that I believe would have led to criminal charges – mischief, baseless lawsuits , trespassing , criminal harassment . I advised her against criminal actions.	SA'D 54-page Letter to Police	May 28, 2024
28	Chart #9: "HATEGAN misrepresents serving documents as "stalking." HATEGAN exaggerates her influence. Shares private information; Projects desire for vengeance; Exaggerates her influence; Expresses contempt for my partner"	SA'D sent me photos/videos of her boyfriend STALKING a woman . No "desire for vengeance" was projected when I disclosed the truth about SA'D and WASSERMAN's illicit activity. SA'D told me THEY wanted revenge . Didn't exaggerate influence – SA'D told me I'm a " big part of her success ".	SA'D 54-page Letter to Police	May 28, 2024
29	Chart #10: "HATEGAN falsely implies she is owed money. Less than \$1,000 was collected in donations specific to the HateGate Affair, which was spent on illustrations, advertising, website hosting, and a celebratory dinner. Claims ownership of HateGate; Claims money is owed"	FALSE. Thousands of dollars were collected by SA'D and not a cent was given to me. I paid my own bill during the "celebratory dinner" referenced by SA'D. SA'D also failed to reimburse me for cost of registering the website domain. SA'D herself acknowledged in writing that I shared ownership of the Hategate project.	SA'D 54-page Letter to Police	May 28, 2024
30	Chart #11: "HATEGAN exaggerates her influence. Contrary to HATEGAN's portrayal, engagement in "Twitter battles" and conflict was not a primary focus. Most of my effort went into documenting protests, with such coverage routinely making the news. HATEGAN tried unsuccessfully to discourage me from attending rallies. Shares private information; Projects desire for vengeance; Exaggerates her influence"	SA'D's text messages PROVE my vital influence & contribution to her brand. On May 18, 2023 she texted me: "You are a big part of whatever success we have" . She thanked & praised me countless times for giving her material for articles, tweet captions, interviews SA'D provides ZERO evidence of how I "project desire for vengeance" simply bec I spoke about her defrauding me.	SA'D 54-page Letter to Police	May 28, 2024

31	Chart #16: "The account she highlights as suicide-baiting her is operated by JOHN THIBEAU, who she now passes information to for the purpose of harassing me and my family."	SA'D is literally LYING to police about me "passing information" to THIBEAU. I don't even know THIBEAU and did not give him any private information, much less "for the purpose of harassing [SA'D] and [her] family". SA'D's claim is entirely fabricated.	SA'D 54-page Letter to Police	May 28, 2024
32	Chart Items #14, #24, #38, #43, #54: "HATEGAN falsely implies she is owed money."	SA'D owes me thousands of dollars & defrauded me to get a year free labor	SA'D 54-page Letter	May 28, 2024
33	Chart Items # 17, 20: "HATEGAN engages in coercive control with reference to suicide. Shares private information; Coercive control; Expresses contempt for my partner"	SA'D encouraged our intimacy & told me I could call her " any hour of the day or night " if I felt suicidal. After she defrauds me, she tells police I engaged in "coercive control" & "manipulated" her. SA'D manipulated & defrauded a suicidal, depressed person for over a year.	SA'D 54-page Letter to Police	May 28, 2024
34	Chart Items #21, #22, #25: "It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. Expresses contempt for my partner"	Text message conversations with SA'D throughout 2023, plus emails sent by WASSERMAN from SA'D's own email, PROVE he intercepts EVERYTHING.	SA'D 54-page Letter to Police	May 28, 2024
35	Chart Item #26: "Coercive control; Collaborates with my harassers"	I never collaborated with any harassers	SA'D Letter	May 28, 2024
36	Chart Item #29: "It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. Nor does my partner control my law practice. HATEGAN is referring to a 14-page letter that was, in fact, a jealous hit piece against my partner. Expresses contempt for my partner"	SA'D's boyfriend sent me several emails from her own law firm email account, from her X/formerly Twitter inbox – which shows he has access to all of SA'D's accounts, and hacked our correspondence without permission.	SA'D 54-page Letter to Police	May 28, 2024

		<p>His SUBSTACK article disclosed privileged meetings with SA'D, and remains live on Substack to this day.</p> <p>SA'D's text messages June-Sept 2023 show discussions over her boyfriend's interception of emails and her profuse apologies. See June 2023 & Sept 2023</p> <p>SA'D's June 2023 text messages show she partly AGREED with my letter at first. She did not call it a "hit piece" until after WASSERMAN referred to it as a "hit piece" in his Oct 7 Substack article, and coached SA'D to call it a "hit piece" in her false police reports.</p>		
37	Chart #32: "HATEGAN makes it clear that she stalks my online activity. Stalking; Expresses contempt for my partner"	SA'D has shown that she stalks MY online activity behind blocks	SA'D 54-page Letter	May 28, 2024
38	Chart #35: "HATEGAN claiming ownership over my project that I invited her to join. HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree. Shares private information. Claims ownership of HateGate; Toxic dependency"	<p>SA'D told me verbally & by text message that I have 50% ownership of the Hategate project. She admitted it would NOT exist without me.</p> <p>SA'D love-bombed me for over a year, encouraged me to be dependent on her, made false promises, allowed boyfriend & client to publish privileged info without my permission, and defrauded me of a year's labour & thousands of dollars.</p>	SA'D 54-page Letter to Police	May 28, 2024
39	Chart #38: "HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely implies she is owed money. It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.	SA'D defrauded me of thousands of dollars , after promising to split journalism earnings with me.	SA'D 54-page Letter to Police	May 28, 2024

	HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator. Claims money is owed; Conspiracy; Indirect communication – LSO”	SA’D’s own text messages and emails PROVE that her boyfriend, ex-con Adam Lee WASSERMAN (12/20/1979) intercepted emails and sent me derogatory messages from her inbox . NO “indirect communication” occurred with the LSO, because I never asked them to pass on any messages to SA’D. I tagged them to report criminal activity and fraud.		
40	Chart #39: “HATEGAN claiming ownership over my project that I invited her to join. HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree. This is direct communication because HATEGAN’S tweet is in response to one of my own threads. She circumvented being blocked from my profile by replying to another account (possibly her own alternate account) in the thread, but her reply tagged me. Claims ownership of HateGate; Toxic dependency; Direct communication”	SA’D told me verbally & in writing that we would split all rights, moneys & contacts from joint project. Then she defrauded me. I have 50% ownership of HateGate . NO “direct communication” occurred.	SA’D 54-page Letter to Police	May 28, 2024
41	Chart #43: “HATEGAN claiming ownership over my project that I invited her to join. HATEGAN falsely implies she is owed money.” “It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. HATEGAN falsely accuses me of filing a false police report. HATEGAN engages in coercive control with reference to suicide. Claims money is owed; Claims false police report; Claims ownership of HateGate. Toxic dependency; Expresses contempt for my partner; Conspiracy; Coercive control”	SA’D defrauded me of thousands of dollars , after promising to split journalism earnings with me. I own 50% of the HateGate project & SA’D acknowledged my ownership in writing. Her boyfriend intercepted emails & DMs and read them without my permission. SA’D filed not one but MANY false police reports.	SA’D 54-page Letter to Police	May 28, 2024
42	Chart #44 – “HATEGAN claiming ownership over my project that I invited her to join. HATEGAN tags LAFLAMME, presumably to have her reach out to one or both of us about this situation. Claims ownership of HateGate; Indirect communication – colleague”	SA’D told me verbally & in writing that we would split all rights, moneys & contacts (such as LAFLAMME) from joint project. She also told me I have joint ownership of HateGate .	SA’D 54-page Letter to Police	May 28, 2024

		<p>Then she defrauded me.</p> <p>No indirect communication occurred.</p> <p>LAFLAMME is NOT SA'D's "colleague".</p>		
43	Chart #45: "HATEGAN employs self-deprecation to garner sympathy while subtly boasting about catching the attention of LAFLAMME. This is a calculated attempt to ruin my professional relationship with LAFLAMME. Indirect communication – colleague"	<p>LAFLAMME praised SA'D for work that <u>/</u> actually did – Sa'd defrauded me and refused to split contacts (as promised)</p> <p>LAFLAMME is NOT SA'D'S "colleague"</p>	SA'D 54-page Letter to Police	May 28, 2024
44	Chart #47: "HATEGAN falsely accuses me of filing a false police report. I had several conversations with DETECTIVE UMBRELLO about whether HATEGAN knew or ought to have known her repeated attempts to communicate were unwelcome, including that Toronto Police advised they issued HATEGAN a caution to stop contacting me. It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. HATEGAN responds to being charged with criminal harassment by broadcasting lies and half-truths to sway public opinion against me, as well as threats to retaliate. This is harassment in and of itself [...]. Claims false police report; Expresses contempt for my partner; Conspiracy Charges; Coercive control"	<p>SA'D filed not one but MANY false police reports against several people.</p> <p>There were NO cautions.</p> <p>I can PROVE that SA'D's boyfriend intercepted emails, texts & social media messages – my text messages with SA'D PROVE this. She apologized for abrasive messages he sent me from HER own email. We have extensive text messages where we discuss him accessing correspondence from me without my consent.</p> <p>I never threatened SA'D. WATSON, her accomplice and leaker of privileged materials, urged violence against me.</p>	SA'D 54-page Letter to Police	May 28, 2024
45	Chart #56: "I have never communicated directly or indirectly with HARRISON about HATEGAN (sic) apart from him sharing his DMs with her where she was ranting and spreading falsehoods about me. Projects desire for vengeance; False claim"	<p>SA'D admits she communicated with HARRISON about me, because she got his DMs with me, which contain ZERO falsehoods about SA'D.</p> <p>HARRISON is homophobic, antisemitic and white supremacist – he has called for deportation of immigrants like me.</p>	SA'D 54-page Letter to Police	May 28, 2024

46	Chart # 57: "HATEGAN QTs herself soliciting contact from anyone who has ever read my work. Shares private information; Solicits my followers"	I did NOT consent to SA'D's boyfriend & client posting private information about intimate or sexual details I only ever told SA'D. By contrast, the info I disclosed wasn't private or of a sexual nature, but proof of stalking and illicit activity by SA'D and WASSERMAN	SA'D 54-page Letter to Police	May 28, 2024
47	Chart #60: "Attached screenshot is a Word document with extensive list of false allegations. Conspiracy SeriousMother; Claims ownership of HateGate; Claims money is owed; Projects desire for vengeance"	Nothing I published about SA'D, her client & her boyfriend is false. SA'D defrauded me of thousands of dollars .	SA'D 54-page Letter to Police	May 28, 2024
48	Chart 64: "HATEGAN makes an implied threat to doxx my partner's name. Projects desire for vengeance. Rewriting her story"	No doxxing occurred, and my post was not a threat or "vengeance". No part of my story was "rewritten".	SA'D 54-page Letter to Police	May 28, 2024
49	Chart #65: "HATEGAN falsely accuses my partner of running @seriousmother. HATEGAN admits to digging up a twelve-year-old article about me that she circulated among my online harassers (DEANA SHERIF, JOHN THIBEAU, BRETT STEWART) to smear me as antisemitic. That article was sent to JOHN MOORE to try and get me kicked off his radio show as a contributor. Stalking; Collaborates with my harassers; Rewriting her story"	WATSON is SA'D and WASSERMAN's accomplice. She published intimate & sexual information I disclosed only to SA'D, via Watson's @seriousmother account. She also incited violence against me – YRP Report 2024-80255 . I never "admitted" to "digging up a 12-yr old article" – I was responding to someone ELSE posting screenshots of a verifiable & accurate article about SA'D in Ottawa Jewish Bulletin , which showed that in 2012 she called for a protest against a Holocaust survivors' celebratory event. I did not "circulate" the article (which is accurate and verifiable) or send it to John MOORE or any radio station. I never "collaborated with harassers".	SA'D 54-page Letter to Police	May 28, 2024

50	Chart #66: "HATEGAN acknowledges that @seriousmother has been linked to MARYANN WATSON yet falsely implies my partner runs the account. Harasses third party – client".	WATSON published intimate & sexual information I only disclosed to SA'D. She also incited violence against me – see YRP Report 2024-80255 .	SA'D 54-page Letter to Police	May 28, 2024
51	Chart #67: "HATEGAN gets upset if anyone does not take her portrayal of her life story at face value. HATEGAN is rebutting @seriousmother, whose research suggests discrepancies in HATEGAN'S version of events. [...] HATEGAN'S threat to go to police indicates she feels harassed by having others talk about her, meanwhile she persists in posting about me. The key difference is that @seriousmother relies on verifiable public information, whereas HATEGAN fabricates salacious conspiracies."	SA'D read my legal files and knows I was innocent. In 1994, the Crown Prosecutor went on record to defend me and released a statement about my innocence. Witness affidavits confirm and back up my innocence. WATSON is SA'D and WASSERMAN's accomplice. She published intimate & sexual information I only disclosed to SA'D in private; also incited violence against me – YRP Report 2024-80255	SA'D 54-page Letter to Police	May 28, 2024
52	Chart #68: "HATEGAN falsely accuses my partner of running @seriousmother. To my observation, @seriousmother has not made any physical threats towards HATEGAN or anyone else. Rewriting her story; False claim; Expresses contempt for my partner"	WATSON published intimate & sexual information I disclosed only to SA'D. The info could only come from SA'D and WASSERMAN, but was published on Watson's @seriousmother X account – YRP Report 2024-80255 .	SA'D 54-page Letter to Police	May 28, 2024
53	Chart #70: "HATEGAN hints at doxxing my client MARYANN WATSON. HATEGAN falsely accuses my partner of running @seriousmother. Harasses third party – client"	See above.	SA'D 54-page Letter to Police	May 28, 2024
54	Chart #72: "HATEGAN falsely accuses my partner of running @seriousmother. My partner is Jewish and does not engage in antisemitism or hate crimes. By contrast, HATEGAN has been charged with hate crimes in relation to her time with the Heritage Front. HATEGAN is projecting about who belongs in jail. False claim – miscellaneous; Expresses contempt for my partner"	WATSON published intimate & sexual information I disclosed <u>only</u> to SA'D. The info could only come from SA'D and WASSERMAN. In March 2024 I reported harassment – YRP Report 2024-80255 .	SA'D 54-page Letter to Police	May 28, 2024

		<p><u>WASSERMAN is a career criminal who was arrested/charged 40 times in 2 decades & spent years in prison</u></p> <p>SA'D read my legal files and <i>knows</i> I was innocent. In 1994, the <u>Crown Prosecutor made a public statement & went on record that I was innocent</u></p>		
55	<p>Chart #73: "HATEGAN falsely accuses my partner of running @seriousmother. HATEGAN has privately expressed serious and disturbing disdain towards Jewish people and Judaism. For example, on Yom Kippur she made it a point to violate each of the five prohibitions and explicitly did not keep kosher. False claim – miscellaneous"</p>	<p>SA'D's lie is egregious and antisemitic given that I am Jewish. I have ethnic Jewish ancestry, my father was a Jew, and I'm Jewish by blood & conversion.</p> <p>Just because I didn't keep kosher on Yom Kippur does not mean that I have "serious and disturbing disdain towards Jewish people and Judaism".</p> <p>In 2012, SA'D planned to protest a <u>Holocaust survivors' event</u>.</p> <p>In 2024, SA'D was sanctioned by the LSO and found to have "<u>engaged in harassing, and/or discriminatory conduct</u>" against a Jewish person, CAHN chair Bernie Farber.</p>	<p><u>SA'D 54-page Letter to Police</u></p>	May 28, 2024
56	<p>Chart #74: "HATEGAN falsely accuses my partner of running "MAW [MARYANN WATSON] is fail at everything" account. Conspiracy; Harasses third party – client"</p>	<p>WATSON published intimate & sexual information I disclosed only to SA'D. The info could only come from her and WASSERMAN. In March 2024 I reported harassment – YRP Report 2024-80255. I never "harassed" WATSON; SHE harassed me for a year and <u>incited violence</u> against me</p>	<p><u>SA'D 54-page Letter to Police</u></p>	May 28, 2024

57	Chart #75: "HATEGAN falsely suggests she is in physical danger from me or my partner. HATEGAN refers to us having dinner together with SHERIF FODA and attributes statements to him that were never made. False claim – miscellaneous; Expresses contempt for my partner"	In Jan 2023, SA'D's boyfriend, ex-con Adam Lee WASSERMAN (12/20/1979) told me he wanted to "take out" her critic Keven Ages (I reported it to police in 2024). WASSERMAN joked about "taking out" Ages during dinner with lawyer Sherif FODA. Foda clearly thought it was a joke, and bragged that he could get WASSERMAN "five years house arrest". I wrote down what FODA said, after that dinner. Will take polygraph test to prove it. <u>WASSERMAN has been arrested and charged 40 times in 2 decades.</u> Many of his charges involve assault and uttering threats. I have every reason to fear both him and SA'D.	SA'D 54-page Letter to Police	May 28, 2024
58	Chart #77: "Leading up to this, HATEGAN contacted my client MARYANN WATSON'S family members (husband and son) threatening criminal and civil consequences if the account @seriousmother did not delete its posts questioning the veracity of HATEGAN'S life story as recounted by her. HATEGAN has falsely accused my partner of running @seriousmother. Harasses third party – client"	See Tab 8 on Page 3-4. SA'D lies to cover for her accomplice WATSON's harassment & incitement of violence against me, <u>two months after</u> I send WATSON a Cease & Desist and file YRP Report 2024-80255	SA'D 54-page Letter to Police	May 28, 2024
59	Chart #78: "Harassing 3rd party; HATEGAN claiming ownership over my project that I invited her to join. Claims ownership of HateGate"	No "harassment" happened. SA'D told me verbally & in writing that I share ownership of Hategate project.	SA'D 54-page Letter	May 28, 2024
60	Chart #80, #81: "HATEGAN'S allegations are delusional but clearly meant to refer to me. For the record, my phone is not cloned; my partner does not hack my privileged correspondence; HATEGAN is referring to a 14-page letter that was, in fact, a jealous hit piece against my partner; my partner is not cyberstalking HATEGAN; my partner did not disclose any secret conversations and does not run a defamatory blog. Expresses	Text messages PROVE that SA'D's boyfriend hacked a private email address SA'D gave me in order to access private correspondence – SA'D agreed with parts of my letter. She didn't call it a "hit piece" until she	SA'D 54-page Letter to Police	May 28, 2024

	contempt for my partner; Indirect communication – colleague; Conspiracy”	started lying to police to have me arrested in order to silence me. WASSERMAN’s defamatory blog is STILL live on Substack as of today.		
62	Chart #82: “HATEGAN falsely implies she is owed money for editing articles. HATEGAN tags CRIER MEDIA, presumably to have them reach out to one or both of us about this situation. Claims money is owed; Indirect communication – colleague”	SA’D defrauded me of thousands of dollars , after promising to split journalism earnings with me. I worked with CRIER MEDIA too; BLUNDELL is MY colleague too. SA’D KNOWS this & STILL lied to cops. No indirect communication occurred.	SA’D 54-page Letter to Police	May 28, 2024
63	Chart #83: “HATEGAN falsely accuses me of depriving her of “thousands of dollars in donations.”	SA’D owes me thousands of dollars .	SA’D 54-page Letter	May 28, 2024
64	Chart # 88, 89, 90: “Harassing 3rd party; Claims ownership of HateGate; Harasses third party – follower. HATEGAN claiming ownership over my project that I invited her to join and trying to pressure a stranger into deleting his tweet that mentions me.”	SA’D lies re. me “harassing 3 rd party” Hategate is 50% mine and SA’D admitted my ownership in text/email SA’D’s false claim that I “tried to pressure a stranger to delete a tweet” is complete fabrication.	SA’D 54-page Letter to Police	May 28, 2024
65	Chart #91: “Imposter syndrome on Purim; Attached selfie is HATEGAN in a bright pink shirt. This was posted after I shared footage of myself at a Barbie-themed Purim party, for which I was dressed in bright pink. Stalking”	I’ve posted the same photo of myself wearing a pink shirt online nearly every Purim since 2016 . I shared my pink shirt photo with SA’D in Feb 2023 text messages . In 2024 SA’D copies ME . She goes to a Jewish event despite not being Jewish and lies to police, telling them I’m an imposter who is “stalking” her .	SA’D 54-page Letter to Police	May 28, 2024

66	Chart #93, #94: "Cryptic messaging; Attached photo depicts a solar eclipse. The meaning of this cryptic tweet was not initially clear, but HATEGAN subsequently released a salacious conspiracy thread on the date of the eclipse (April 8, 2024). Cryptic messaging; Fiat iustitia et pereat mundus. Latin translation: Let justice be done, though the world perish. Cryptic message that seems intended to intimidate."	<p>My tweet is not even about SA'D but about a solar eclipse. But SA'D lies to police, telling them my tweet "seems intended to intimidate" her.</p> <p>On April 8, I posted evidence-backed research, NOT a "salacious conspiracy thread". SA'D's false police reports prove that she cyberstalks me.</p>	SA'D 54-page Letter to Police	May 28, 2024
67	Chart #95: "Blocked by Dean. HATEGAN disparages my professional contact DEAN BLUNDELL, suggesting she was treated unfairly because of his loyalties to me. "Pinned thread" refers to her tweets about The Lawyer Next Door. False claim – miscellaneous. Harasses third party – colleague"	<p>Dean BLUNDELL is MY colleague too. I had a <u>preexisting</u> relationship with Blundell before I knew SA'D existed.</p> <p>In Dec 2022 I appeared on Blundell's show. <u>In January 2023 he offered me a CRIER MEDIA contract</u>, which I did not sign but collaborated to Crier on an ad hoc basis. SA'D KNOWS this – I <u>told SA'D about BLUNDELL's offer</u>.</p> <p>Text messages prove I knew Blundell long <u>before SA'D first contacted me</u>.</p>	SA'D 54-page Letter to Police	May 28, 2024
68	Chart #96: "Cryptic message; The clue is the name ADAM WATSON. I have no knowledge of this person. JOHN THIBEAU made posts that led me to discover WATSON has apparently listed my mother's home address as his address on articles of incorporation. HATEGAN and THIBEAU appear to be working together to stalk my mom. Stalking; Collaborates with my harassers"	<p>SA'D lies to police by claiming she doesn't know an "ADAM", when in fact her boyfriend's name is ADAM.</p> <p>SA'D lies to police, telling them that I "worked together" with stranger(s) to "stalk" SA'D's mother. Total fabrication to cover for WASSERMAN's criminal activity and possible CRA fraud.</p>	SA'D 54-page Letter to Police	May 28, 2024
69	Chart #99 [Re. tweet describing WASSERMAN's ownership of SP411.cc and Copicraigs] – "Conspiracy; Projects desire for vengeance; False claim – miscellaneous"	SA'D lies to police by falsely claiming the facts I posted about WASSERMAN are "false claims", "conspiracy" and "desire for vengeance". FACT: SA'D's	SA'D 54-page Letter to Police	May 28, 2024

		boyfriend is the owner and CEO of sex industry businesses Copycraigs and SP411.cc and SP411.com – a prostitution review website Toronto Life Magazine called “ The TripAdvisor of Sex Work ”. WASSERMAN boasted he is “ the most powerful person in all of Ontario adult entertainment ”.		
70	Chart #100: “Conspiracy; HATEGAN falsely accuses me of filing a false police report. HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.”	SA'D filed MANY false police reports against several people. This is a FACT. NO “indirect communication” occurred with the LSO, because I never asked them to pass on any messages to SA'D. I tagged them to report criminal activity and fraud.	SA'D 54-page Letter to Police	May 28, 2024
71	Chart # 101, 102, 103, 104, 105, 106, 110: “Conspiracy; HATEGAN falsely states she is owed money. It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator. Claims money is owed; Expresses contempt for my partner; Conspiracy; Indirect communication – LSO”	SA'D defrauded me of thousands of dollars , after promising to split journalism earnings with me since our first article (which I ghostwrote for her) was published in NOW Magazine in December 2022. SA'D's boyfriend hacked/read our emails without my consent – she even apologized for it.	SA'D 54-page Letter to Police	May 28, 2024
72	Chart #108: “HATEGAN falsely accuses me of filing a false police report.	FACT: SA'D filed MULTIPLE false police reports against SEVERAL people.	SA'D 54-page Letter	May 28, 2024
73	Chart # 112, 113: “HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction.”	Egregious lie by SA'D. Text messages 2021-2023 prove that SA'D initially contacted me to gain access to my legal documents to use against CAHN members. SA'D came up with the idea of making a podcast about me.	SA'D 54-page Letter to Police	May 28, 2024

		<p>It was 100% her idea – her text messages prove it. I NEVER asked her to circumvent any Superior Court injunction – in fact, <u>she bragged that she wasn't bound by a court order.</u></p> <p>SA'D lied and conned me into working for free for a year, and defrauded me of <u>thousands of dollars</u></p>		
74	<p>Chart # 114, 115: "Attached screenshot is a from Word document. HATEGAN recounts a conversation at dinner with SHERIF FODA that is completely fabricated. FODA did not make any comments about Law Society discipline processes, nor did he provide HATEGAN legal advice. HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction."</p>	<p>I will take a polygraph test to recount that evening's conversation. I wrote down FODA's words later that night.</p> <p>SA'D's own text messages PROVE that <u>SHE came up with the idea of making a podcast about me to circumvent a Superior Court injunction.</u> It was 100% her idea; I pleaded with her not to do anything that could get her in trouble.</p>	<p><u>SA'D 54-page Letter to Police</u></p>	May 28, 2024
75	<p>Chart # 116: "HATEGAN claiming ownership over my project that I invited her to join."</p>	<p>SA'D told me verbally and in text messages and emails that I am co-owner of OUR project – not SA'D's.</p>	<p><u>SA'D 54-page Letter to Police</u></p>	May 28, 2024
76	<p>Chart #119: "HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator. Claims money is owed; Indirect communication – LSO"</p>	<p>Contacting LSO, a law regulator, to report fraud /crime by a lawyer is NOT indirect contact with the lawyer. I never asked LSO to contact SA'D.</p>	<p><u>SA'D 54-page Letter to Police</u></p>	May 28, 2024
77	<p>Chart #120 and #121: "HATEGAN claiming ownership over my project that I invited her to join. HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money. Harassing 3rd party; Claims money is owed; Claims false police report; Claims ownership of HateGate"</p>	<p><u>SA'D acknowledged my 50% ownership of OUR Hategate project verbally, in emails & text messages.</u> She owes me <u>thousands of dollars</u> she defrauded and robbed me of. I didn't "harass" any third party. SA'D</p>	<p><u>SA'D 54-page Letter to Police</u></p>	May 28, 2024

		has made MULTIPLE false police reports about SEVERAL people.		
78	Chart #122, #124: "HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money. HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator. Harassing 3rd party; Claims money is owed; Claims false police report; Claims ownership of HateGate; Conspiracy; Indirect communication – LSO"	SA'D has filed MULTIPLE false police reports against MULTIPLE people. Contacting LSO, a law regulator, to report fraud /crime by a lawyer is NOT indirect contact <u>with</u> the lawyer. SA'D owes me <u>thousands of dollars</u> . I didn't "harass" any "third party"	<u>SA'D 54-page Letter to Police</u>	May 28, 2024
79	Chart #125: "HATEGAN claiming ownership over my project that I invited her to join. HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money. Harassing 3rd party; Claims money is owed; Claims false police report; Claims ownership of HateGate; Solicits donations"	<u>SA'D told me verbally & in writing (text + email) that I share ownership of OUR project.</u> SA'D filed MANY false police reports. I paid for the Hategate website domain and SA'D kept all the money collected through the <u>Donation buttons</u> – stole my share	<u>SA'D 54-page Letter to Police</u>	May 28, 2024
80	Chart #126: "HATEGAN falsely states she is owed money. Claims money is owed; Harasses third party – follower"	All I did was ask X/Twitter users to inform me if they had donated money after the publication of the HateGate Affair, and what amount they gave – because I was owed 50%. SA'D conned & defrauded me into writing the HateGate article by promising I would receive 50% of all donations and earnings. I paid for the HateGate website domain and <u>SA'D kept all money collected through the Donation buttons – stole my share</u>	<u>SA'D 54-page Letter to Police</u>	May 28, 2024

	Chart #127: "HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely implies she is owed money. Claims money is owed. Defrauded; Claims false police report; Claims ownership of HateGate"	See above.	SA'D 54-page Letter to Police	May 28, 2024
81	Chart #129: "HATEGAN falsely implies she is owed money. Defrauded."	See above.	SA'D Letter	May 28, 2024
82	Chart #131: "Attached selfie was taken at the University of Toronto and posted on my birthday. I have been documenting the campus encampment since May 2, 2024 . This was made public on my social media posts, and my footage being featured by mainstream outlets. HATEGAN attended on May 7, 2024. She approached DAVID MENZIES to spread false and salacious rumours about me. She told him I should know that she would "Get me back" once her charges were withdrawn. MENZIES conveyed this message to me on May 8, 2024."	<p>I did not go to the University of Toronto to "stalk" SA'D, who has no connection to the area. I lived and/or worked in the U of T area since 2001. My mother lived on Charles St W, next to the campus. My ex-partner taught on the UofT campus for over 15 years. I regularly travel downtown with her. SA'D met my partner & <i>KNOWS</i> this.</p> <p>I saw MENZIES and introduced myself to him as the principal author of The Hategate Affair, which he praised SA'D for authoring. I NEVER made the statement SA'D lies about. I just told him that I was the one who wrote Hategate, that SA'D lied, and it would all come out in court. Then Menzies gave me his business card. Why would Menzies give me his card if I uttered threats/came across as threatening?</p> <p>SA'D didn't provide an affidavit from Menzies to back up her lies because what she claims I said never occurred. I will take a polygraph test to prove it.</p>	SA'D 54-page Letter to Police	May 28, 2024
83	Chart # 133, 134: "HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money."	See above.	SA'D Letter to Police	May 28, 2024

84	Chart #137: "HATEGAN appears to be hunting WATSON. Stalking; Expresses contempt for my partner; Harasses third party – client"	SA'D is lying to cover for WATSON's harassment & incitement of violence against me, two months after I send a C&D to WATSON & report her to YRP	SA'D 54-page Letter to Police	May 28, 2024
85	Chart #138: "Attached video of squirrel appears to be filmed at the University of Toronto. I have been documenting the campus encampment since May 2, 2024. This was made public on my social media posts, and my footage being featured by mainstream outlets. HATEGAN is making indirect reference to one of my viral videos which featured a boy trying to lure squirrels with nuts. Stalking"	SA'D is lying to police and urging them to arrest me for "stalking". I've posted photos/videos on Twitter & Facebook) of me interacting with squirrels on the UofT campus since 2016 . If anything, SA'D copied ME.	SA'D 54-page Letter to Police	May 28, 2024
86	<p>"Elisa Hategan has just engaged in more indirect communication, this time by tagging an employer (Legal Professionals Education Network) and my professional regulator (Law Society of Ontario). The tweets include partial and misleading screenshots from our private messages or DMs. The materials sent on May 28, 2024, should help clarify the scope of Elisa Hategan's ongoing harassment and breach of conditions.</p> <p>Additionally, I had to file two separate yet connected police reports in April and May about Josh Chernofsky (24-812268) and Gisela McKay (24-1203674), both of whom are actively spreading Elisa Hategan's conspiracy theories on top of the issues complained of in my reports. The group of people targeting me both individually and collectively are escalating their attacks.</p> <p>Can I please book a time to visit the station ASAP? I would like to take you through the supplementary evidence specific to Elisa Hategan and connect it to the broader network of harassment.</p> <p>I need support from TPS to enforce the law and protect my safety, including by issuing cautions and/or laying charges (including the possibility of defamatory libel, s. 298 Criminal Code). I am available at your earliest convenience. My life is pretty much on hold due to the constant state of fear."</p>	<p>Tagging the Law Society of Ontario (LSO), a professional regulator, to report being victimized is NOT indirect communication, because:</p> <p>a) I did NOT ask the LSO to pass on a message to SA'D (no indirect communication)</p> <p>b) I did NOT tag SA'D in the tweets (no direct communication)</p> <p>According to advice I've received from multiple lawyers, contacting the LSO to report a wrongful act should NOT be viewed as an arrestable offence.</p> <p>If I was assaulted by a police officer and called 911 or tagged Toronto Police to report the crime, I am not directly OR indirectly contacting the cop who assaulted me. I am simply communicating what happened to ME, a victim, to a regulator mandated to investigate such assaults.</p>	SA'D Email to Police June 5 2024	June 5, 2024

87	<p>“Dear D.C. Vigna, I am following up because Elisa Hategan persists in obsessively posting about me on social media. Her latest post suggests that I tried getting police to kill her and/or provoking her into suicide. She includes a list of cherry picked messages from me to her. [...]</p> <p>For someone to be charged with criminal harassment to continue unabated with a vicious public attack campaign against the target makes a mockery out of the justice system. Her posts are designed to incite others and deprive me from having any peace of mind.</p> <p>Elisa Hategan has participated in extremist (neo-Nazi) behaviour from an early age, and she was trained in harassment techniques by a CSIS operative. She specializes in manipulating others to do her bidding — I know because she tried influencing me to go after Moore on countless occasions.</p> <p>As her current object of fixation, I find myself living in a constant state of fear and anxiety. Police intervention is the only form of recourse available to make this stop. Please let me know what additional information is required to consider laying additional charges, including breach of recognizance or defamatory libel.”</p>	<p>SA'D's text messages <u>prove</u> that <u>SA'D came up with the idea</u> of making a podcast about me. It was 100% her idea. I NEVER asked her to circumvent any Superior Court injunction.</p> <p>SA'D text-messaged me that SHE wanted to “fuck up” my “enemies” and Elizabeth Moore would “not have the last laugh”.</p> <p>On 09/17/2023, SA'D texted me that she “will do everything possible to adjust Moore’s confidence levels”</p> <p>On 09/13/2023 SA'D texted me: “<u>Lol I am not subject to any order. So I don’t have any order to breach</u>”.</p> <p>On 9/12/2023 SA'D told me of her <u>intent to write about MOORE. I told her I couldn’t tell her what to say/do.</u> This PROVES that SA'D LIED to police about me trying to manipulate & influence her to “go after Moore”.</p>	<p><u>SA'D Email to Police</u> <u>June 18 2024</u></p>	June 18, 2024
88	<p>“Dear D.C. Vigna, Please see the latest from Elisa Hategan: These posts constitute ongoing harassment against me.”</p>	<p>FALSE – speaking publicly about how I was defrauded is NOT harassment. “Slander” is not a criminal offence. SA'D never sent me any defamation notices, because everything I wrote is true. Instead, she kept trying to have me arrested, using 14 Division police as her PR team to frighten and silence me, rather than sue for libel.</p>	<p><u>SA'D Email to Police</u> <u>June 19 2024</u></p>	June 19, 2024

89	<p><u>JUNE 25, 2024 TPS REPORT:</u> “On December 10, 2023, after the accused being released on an undertaking, at approximately 10:45 PM, the accused, accessed her X (formerly known as Twitter) social media account and had made several posts recounting her relationship with the complainant and slandered her reputation by claiming that complainant had been engaging in discreditable conduct in her profession as a journalist. Several third parties had gained access to private message conversations between them, which could only be accessed by the complainant and the accused.</p> <p>Furthermore, on December 12 2023, the complainant, had observed on her X (formerly Twitter) social media account that the accused had been posting “replies” to her personal X posts from the accused own X account</p> <p>This form of communication has been continuous from the onset of the accused release, on December 10th 2023, on through with the last posted date on June 18 2024 (CHARGE).”</p> <p><i>Note: My December 10, 2023 release conditions state "Do not communicate WITH SA'D, directly or indirectly".</i></p> <p><i>Conditions do NOT say "Don't communicate ABOUT her".</i></p> <p><i>SA'D would have had to circumvent my blocks and stalk my social media page from alternate account(s) in order to monitor what I was writing.</i></p>	<p>FACT: CONTACT CANNOT HAPPEN on X when parties are blocked. It is IMPOSSIBLE for two parties who are blocked to post “replies” to each other. Posts by a blocked account are NOT sent to a blocker.</p> <p>SA'D told police she had blocked me. I reciprocated the block. Her claims are false and impossible.</p> <p>SA'D convinced police to arrest me because I talked <u>ABOUT</u> her on X (behind mutual blocks) not <u>TO</u> her.</p> <p>After my December 2023 arrest, I had NO RELEASE CONDITIONS to prevent me from speaking <u>ABOUT</u> SA'D. Those conditions were added AFTER MY SECOND ARREST ON JUNE 26, 2024.</p> <p>“SLANDER” is <u>NOT</u> a crime listed in the Canadian Criminal Code. Me speaking ABOUT my relationship with SA'D is NOT “Indirect Contact” OR “Direct Contact” WITH SA'D.</p>	<p><u>TPS Report</u> <u>2023-</u> <u>2858414</u></p>	June 25, 2024
90	<p>On June 26, 2024, Toronto 14 Division Police charge me with “Fail to Comply” with my Dec 10, 2023 release conditions</p> <p>New condition added: Do not post anything about SA'D on social media</p>	<p>This is the SECOND TIME I am wrongly arrested/charged based on SA'D's lies. Duty counsel reads me a letter from SA'D telling Crown I SLANDERED her</p>	<p>Crown did not give me a copy of letter</p>	June 26, 2024
91	<p><u>January 15, 2025 TPS REPORT:</u> “The complainant advised police that the accused had purchased the web domain, [carymasad.ca] in January 2023. The complainant provided officers with photo messages</p>	<p>SA'D uses my June 2024 release condition to try to get me arrested for</p>	<p>TPS Report 2024- 2249135</p>	Jan 2025

	<p>confirming the accused owns the website. The complainant advised <i>no one else would have ownership of this website, only the accused.</i></p> <p>“On this website there are multiple linktrees to different websites. On this website there is a linktree which allows you to access the X account (formally known as Twitter) @SP411STAR which contains multiple messages directed towards the complainant and it mentions her by name.”</p> <p>“From viewing the information on evidence.com that was provided to me at the time I was satisfied that HATEGAN had breached her release order on two separate occasions, August 2024, and November 2024.</p> <p>– I contacted HATEGAN’s defence lawyer Megan Schwartzentruber, I advised of the allegations made and for her client HATEGAN to turn herself in at 14 Division. I was advised that by the 28th of January that her client would turn herself in to 14 Division.”</p> <p>January 24, 2025 TPS REPORT: “I advised Ms. Schwartzentruber of my findings, and to advise her client that she is not arrestable.”</p> <p>“The complainant provided me with information that was uploaded onto evidence.com, including messages from a twitter account Dreamer, which she suspects to be HATEGAN. She had advised me that she observed that name on her phone previously, I was not advised of a date or location”.</p> <p>“I did not write a production order for twitter and other social media accounts because, I don’t have the grounds to support that it is HATEGAN at this time”. “I was not satisfied with everything provided that charges would be warranted at this time”.</p>	<p>another breach, falsely claiming I “posted about her on social media”</p> <p>SA’D lies to police, telling 14 Div TPS that I operate anonymous X/Twitter and LinkTree accounts that I don’t own (and don’t know who does), and own internet domains I do not own. She tells them that “NO ONE ELSE would have ownership of the website, ONLY THE ACCUSED”.</p> <p>SA’D also lies about “seeing” me using X account Dreamer/@Focustnv on my phone – an egregious lie. I don’t own the account and don’t know anything about it.</p> <p>When DC McNabb asks SA’D for the date/time she supposedly saw this, she could not give an answer – because it’s a total fabrication and it never happened.</p> <p>I was told that I would be arrested & charged for a third time with 2 counts of “Failure to comply”.</p> <p>I had to pay \$3000 in legal bills for my lawyer to argue with McNabb for a week, until he decided to look closer at the “evidence”. On Jan 24, McNabb concluded that I “was not arrestable”.</p>		
92	<p>SA’D’s tweet on X: “Got an unsolicited call from @TorontoPolice Hate Crimes Unit today, which marks the first time cops have reached out proactively to make an arrest based on my footage. But this spitting incident did not happen in a vacuum, nor was it a random attack.</p>	<p>On January 27, 2025, SA’D publishes a post about me on X, accompanied by a photo collage of 9 people, including a cropped photo of me taken when I</p>	<p>Jan 27 2025 SA’D tweet posted on X.</p>	Jan 27, 2025

	<p>There is a coordinated, ongoing hate campaign intended to limit my participation in the public sphere as a lawyer, journalist, and citizen. I have been targeted nonstop since 2021, and my family, clients, friends, colleagues, and supporters harassed as proxies; my videographer takes the brunt of abuse.</p> <p>This spitting situation likely got special attention due to widespread outrage online— the public relations department is perhaps the tail wagging the dog at @TorontoPolice. In fact, I have documented and/or reported countless other crimes with no meaningful follow up. A meeting is being set up with @TorontoPolice to discuss the underlying harassment, specifically hatred and violence incited against me by Gisela McKay, <u>Elisa Hategan</u>, Josh Chernofsky, Jennifer Evans, Deana Sherif, Joe Morin, Clayton Goodwin, John Thibeau, and Brett Stewart. This criminal element within the protest circuit is supported in part by politicians, union members, and certain media outlets. My case is only the tip of the iceberg. #cdnpoli #ProtestMania”</p>	<p>joined SA'D in Ottawa in June 2023. SA'D cropped herself out of the photo and used my image to accompany an utterly false and libellous post that states I belong to a “criminal element” that “incited” “harassment” and “specifically hatred and violence” against Sa'd.</p> <p>She lies to police and tries to tie me to a stranger who spat at WASSERMAN, her boyfriend, on the street.</p> <p>I do NOT attend protests and had nothing to do with the incident SA'D conflates with my name.</p> <p>SA'D states that she is meeting with Toronto Hate Crimes Unit to report me (and 8 other people) for “<u>inciting hatred and violence</u>” against her.</p>	<p>I don't have a copy of the false report SA'D filed w/ Toronto Hate Crime Unit</p>	
	ALL CHARGES AGAINST ELISA HATEGAN ARE WITHDRAWN BY CROWN			March 6, 2025
93	<p>Four days after my charges are dismissed, and three days after SA'D and WASSERMAN's stalking victim Jennifer EVANS publicly names me as her <u>witness in an upcoming court case</u>, SA'D goes to police again in revenge. SA'D swears false “Information” for a baseless peace bond application. On MAY 14, SA'D's bogus peace bond application is thrown out of court at the Crown's request.</p>	<p>By swearing a false Information, SA'D commits Perjury & Intimidation.</p> <p>Perjury is a criminal offence under Canadian Criminal Code s. 131(1)</p> <p>Intimidation of a Justice System Participant – CCC s. 423.1.</p>	<p>Uncertain – <u>Reported to TPS 14 Div or Justice of the Peace</u></p>	Mar 10, 2025
94	<p>SA'D phones in a bogus 911 wellness call as a malicious attempt to intimidate me in revenge for me publishing an article (one day earlier) about what she did to me.</p> <p>On July 10, 2025, one day earlier, <u>I published a Substack article titled “The Many Lies of Caryma Sa'd”</u>. In it, I describe suicidal ideation I</p>	<p>SA'D lies to police, telling them I was suicidal and threatening to jump off Leaside Bridge. As a result, YRP is dispatched to my address.</p> <p>I already have PTSD as a direct result of SA'D's malicious actions.</p>	<p>York Region Police Wellness Check</p>	July 11, 2025

<p>experienced in January 2025 as a result of SA'D's lies to 14 Division Police DC McNabb, which nearly resulted in a third baseless arrest.</p> <p>In July 2025, I was <u>not</u> suicidal.</p> <p>In revenge for my article, and to intimidate me from testifying against her in <u>civil cases where I am a witness</u>, SA'D calls 911 and lies to police.</p> <p>SA'D falsely claims that my Leaside Bridge comment – from SEVEN MONTHS EARLIER – is an immediate threat that requires police intervention.</p> <p>SA'D maliciously wasted law enforcement resources once again in order to re-traumatize me with police involvement.</p> <p>A couple of weeks later, <u>SA'D publishes a photo of herself smirking on Leaside Bridge</u>, with the taunting caption: <i>"Please keep bicycles and pedestrians off the highway."</i></p>	<p>I was extremely upset and had a panic attack as a result of her weaponizing police against me. Again and again.</p> <p>This incident is part of a prolonged, two-year effort by SA'D to discredit me as a witness, cause me intense mental distress, and <u>push me to suicide</u>. Why is she doing this? To ensure that I don't sue her for fraud, provide evidence to police or the LSO (leading to disbarment), or testify against her on behalf of all the victims who were stalked, harassed, and falsely accused of criminal acts by SA'D and WASSERMAN.</p>		
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According to documents I obtained from Toronto Police Services through a Freedom of Information (FOI) request that was fulfilled in summer 2025, I remain under police investigation. I don't know what other lies SA'D communicated about me to police. I live in a perpetual state of fear, anxiety and distress, and can't afford to repay the money (\$30,000) I borrowed to defend myself against SA'D's malicious falsehoods.

My life and career prospects have been irrevocably altered and devastated by SA'D's malevolent and utterly false allegations. SA'D has repeatedly leveraged her status as a lawyer to shield herself and her criminal boyfriend from police scrutiny. She is destroying lives with impunity and weaponizing police as a PR move against critics, all the while hiding behind the veneer of credibility conveyed by her law license.

I know that she will not stop terrorizing me with false police reports unless police and the courts intervene to hold her accountable.

SA'D's lies to police contravene section 140 of the Canadian Criminal Code (Mischief), section 423.1, specifically the law that governs Intimidation of a witness; section 139(2)(a) (Obstruction); and s. 131(1) on Perjury (swearing false information for a baseless peace bond application).

TAB 3

CARYMA SA'D LIES TO POLICE ABOUT HER BOYFRIEND'S INVOLVEMENT

Document prepared by Elisa Romero Hategan, October 2025

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Between 2023-2025, CARYMA SA'D LIED TO POLICE in multiple false police reports, an AXON video, lengthy letters and persistent emails to 14 Division cops, telling cops that I was a liar and there was NO third-party involvement in my case. She repeatedly denied that her ex-con boyfriend Adam Lee WASSERMAN (DOB 12/20/1979) had access to her emails/social media inboxes, and that he sent me [derogatory emails](#) using her own law office email (which proves he has access to her inbox). SA'D also denied that WASSERMAN hacked our correspondence.

This document contains a transcript/chronology of text messages between SA'D and I related to me being blocked and unblocked – always due to her boyfriend's rage and control issues. It PROVES that what she told police were irrefutable lies intended to have me wrongfully arrested/charged in order to stop me from disclosing the truth about SA'D & WASSERMAN's fraudulent and illicit activity.

WASSERMAN has a history of intercepting our communications without my consent, and blocking me against both my and SA'D's wishes. He did this in June 2023, and twice in September 2023 – detailed herein.

On previous occasions, SA'D and I resorted to communicating behind his back. After the third block, it did not happen. But without a SINGLE message from SA'D to tell me that my emails were unwanted, and in the absence of any cautions from her lawyer friends or police, I had no way of knowing this time was different, or that WASSERMAN wasn't intercepting and deleting my correspondence.

“You Are a Big Part of Our Success”

“[You’re an inspiration.](#)” – SA’D, October 15, 2022

“There’s nothing they could say to make me question your intentions or [authentic, innate goodness.](#)” – SA’D, Dec 2, 2022

“You’re a [miracle worker](#)” – SA’D, January 1, 2023

“[You can call me any hour of the day or night.](#)” – SA’D, January 7, 2023

“I love you. And Lee loves you. We both love you.” – SA’D, January 19, 2023

“If spite isn’t enough to sustain that will [to live], [I hope love is.](#)” – SA’D, January 27, 2023

“[The more I know you, the more I admire you.](#)” – SA’D, March 10, 2023

“[Elisa Hategan is a national hero](#) who does not get due credit for her accomplishments.” – SA’D Amazon book review, March 25, 2023

“[You are a big part of whatever success we have.](#)” – SA’D, May 18, 2023

“I made a promise to you that I would never break. But even not knowing you long has impacted me more than many [lifelong friendships](#). [...] You’re [too important to erase.](#)” – SA’D, June 6 2023

“I hope that I explain this right, but when you said “imperfect witnesses” earlier I was like, “Imperfect isn’t exactly it because [Elisa hasn’t done anything wrong](#)” – SA’D, September 5, 2023

“[Canadian icon @ElisaHategan](#) is not afraid to pull back curtains. She has a beautiful way with thoughts & words. **Without her, there would be no #Hategate exposé.**” – SA’D, Sept 18, 2023

“[You are a masterpiece](#)” – SA’D, September 7, 2023

“[I love you both.](#)” – SA’D, May 27, 2023

“[I love you both.](#)” – SA’D, September 18, 2023

I don’t think it was a figment of my imagination. [The synergy, how our thoughts meld.](#)” SA’D, Sept18 2023

“I hate that he was careless in his expression, and hurt you. For that I am [endlessly sorry.](#)”

“[I’m sorry, but please don’t quit what we have.](#)” – SA’D, September 18, 2023

“[We would take bullets for each other](#)” – SA’D, September 29, 2023

“After a lifetime of you fighting, it’s my turn for the heavy lifting. I wish we were of the timeline where we had private island and limitless credit cards. I hope those versions of ourselves realize how good they have it. But I also know that in another timeline, we never properly crossed paths and this connection never came to be. So [I realize how good I have it.](#)” – SA’D, **September 30, 2023 – approx. 12 hours before** she first calls 911 on me.

June 2023 - First Time WASSERMAN Blocks Our Communications

From winter 2022 to Sept 30, 2023, SA'D viewed me as a "[consigliere](#)".

She would share ideas of actions she planned to engage in, and send me clips of particularly contentious videos or posts she planned to upload to social media – whenever Lee insisted on posting a controversial video and SA'D had qualms about it, I became the tiebreaker.

In the span of ten months (Dec 2022 to Sept 2023), I talked them out of nearly a dozen ideas which, in my view, could have had disastrous consequences on SA'D's reputation and career, and may have led to criminal charges. As SA'D increasingly sought my advice, and as I kept kyboshing WASSERMAN's ideas of revenge on their "enemies", I worried that it would place me in a position where he would feel that I was spoiling his fun, burst the bubble on their echo chamber, and he would come to view me as a threat to his total control over SA'D. Which is exactly what happened.

My concerns stemmed from the fact that I was an investor in SA'D's brand, a co-author and co-creator of shared journalistic projects, and actively part of her working team. We were also in the process of starting a not-for-profit organization.

SA'D promised me that I would eventually be compensated, and I took working with her seriously. I believed that my future and my career were intertwined with hers. Therefore, the criticism and accusations of harassment levied against them by their critics also impacted my own reputation.



In June 2023, SA'D invited me to go with her and her boyfriend, Adam "Lee" WASSERMAN, on an overnight trip to Ottawa, where we would document a large protest and counterprotest revolving around teaching about trans issues and LGBTQ sex ed in schools. What I witnessed on the June 8-9th Ottawa trip echoed what I saw every time SA'D and I hung out. It was clear that WASSERMAN was much more than a "cameraman" – he ran her business. All calls to her office were routed to his cell phone, which meant he intercepted every call that came through her business line. I was sure he'd cloned or installed some kind of spy app on her phone because she complained about glitches whenever he called. WASSERMAN filtered all callers, answered questions about fees and services, informed prospective clients where to send payments and retainers, decided whether to transfer calls to her or schedule a time when she would return them. He was office receptionist, admin assistant, business manager and talent agent rolled into one – but above all, he was a gatekeeper.

After so many years of WASSERMAN managing her business and decisions, SA'D ran almost everything by him. And unfortunately, his penchant for holding grudges and seeking revenge dictated that they spent most of their time pursuing petty vendettas. Every attempt I made to sway her away from destructive conflict was undone almost as soon as I thought the danger had been neutralized.



The Letter that Changed Everything

After we came back from the June 9, 2023 trip to Ottawa, I started composing a letter addressing serious concerns I wanted to bring up in person with SA'D, but I couldn't get her alone long enough to talk about it. WASSERMAN jealously guarded our physical interactions like a hawk (in his October 7, 2023 Substack article, he confesses feeling jealous about our friendship and that SA'D and I had exchanged "I love you's". We were seldom alone for longer than an hour without him encroaching upon us, watching and listening but not contributing anything meaningful, which made it awkward since there were things I wasn't comfortable discussing in his presence.

My urgency grew as I realized there was no way to ensure privacy in our communications. WASSERMAN appeared to monitor everything. He'd already replied to me using her email and Twitter DMs, so I knew he was likely to intercept anything I tried to send electronically.

I decided to print my letter out and planned to give it to SA'D in person when we'd arranged

to meet on June 20, but at the last minute she told me that WASSERMAN wanted to attend a protest instead – and every time he demanded something of her, she seemed to acquiesce. SA'D asked me if I wanted to come along, but I knew that it meant I wouldn't be able to address my concerns in his presence. So I tried a different tactic – I asked her for a private email.

2023-06-20 Twitter Direct Messages

10:40 AM Elisa: Is there an alt email address or any way I can message you sometime that is private? I mean, your eyes only and nobody else? If so, pls let me know. I'm not sending you anything today, would just like it for future reference.

I hear your argument that it's all the same no matter where we hang out, but to me it's not all the same. So we'll have to agree to disagree on that one

Caryma: csad008@gmail.com

But tell me if you're sending something so I know to check

Yeah, that's fair. Mine is definitely the abnormal view.

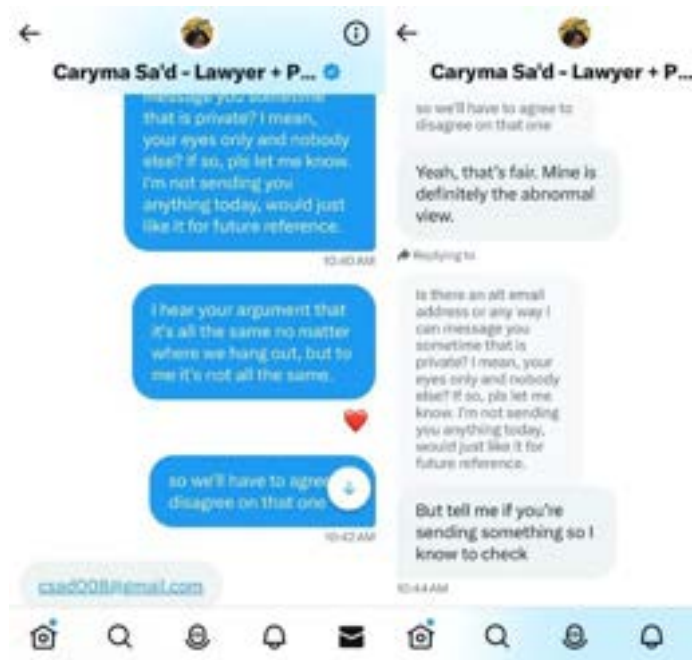
Elisa: Thank you. I've been writing you a letter throughout the weekend. I promised myself never to send anything to anyone when I'm upset. And so I won't. But I'd like the option of sending it, at some point, if I am clear-minded and feel it's necessary. I will dm or text you if I send it.

The reason why it's not all the same: we're out chasing a story instead of collaborating on our own; because we made plans to get together and literally with less than one hour before I hopped into an Uber, I got bumped for something else; because I don't have hope that you will be able to get the podcast done by the deadline; because sometimes I want to have quiet girls time to talk, and I never feel that we have any privacy; because whenever we're in a van or on the way, Lee gets really super-excited about the protests we're either going to, or have just left, and it's very hard to shift the focus of the convo away from that; because depending on where we're sitting, and the noise all around, I still don't feel like I can carry on a conversation about things that deeply matter to me.

And I could add more to this list, but I think this captures the gist of it. I think the problem is, we diverge on what we consider "hanging out". For me, it has to have some meaningful aspect, so the being vs not doing, whereas for you, it's the doing, not the being. I hope that makes sense

Caryma: Aha. When you lay it out like that, I understand.

Elisa: So for you, it's logical that chasing a drag event or jumping from one activity to another, is "hanging out".



Caryma: Sorry, I didn't mean to be a dick. Not at all.

Elisa: I'll email you sometime. I don't think I can bottle it all up. I just have to be delicate about it so I don't turn into a dick myself, lol

Caryma: I truly saw it as the same thing. I'll take note of this going forward

Elisa: It's not though, not for me. But I think it's about managing expectations on both ends. I love hanging out with you guys, I honestly do. But this drag bs shit, it can't be the primary thing we do because I have needs for more meaningful connections beyond that

Caryma: Yeah, now I get that. And it only works if we are on the same page on that issue, otherwise feelings get hurt and resentment builds.

Elisa: yes, exactly

Caryma: Okay so if you have it in your heart to chalk this one up to oblivious ignorance or semi-youthful exuberance I won't make the same mistake going forward.

Elisa: It's ok, we were bound to cross this situation at some point; just wish it didn't happen today, but I think it's good because it'll focus my thoughts on writing down my thoughts as best I can. It's through writing that I can best articulate my position. I'll take the time we would have spent today, to do it.

In the meanwhile, have a safe trip and tell Kumar to slow tf down if he speeds too much

I had some stuff for you that I'll bring on Friday, provided you still want to hang out with me after you read my letter lol

Caryma: There's not much you could say that would prompt such a reaction

Elisa: People don't like to be shown how others view certain situations. So I have to really frame my positioning. I was debating finishing it, printing it out and giving it to you today, and then I changed my mind. But I think I should get it done, because without open communication there's no real friendship anyway

Caryma: I spent the weekend getting lectured by everyone else in my life whose opinions I care about, so clearly there's a common denominator. Meaning, no hard feelings

Elisa: I will do my best to outline how I view things, both re. this situation and other matters, and then you can - hopefully - make up your own mind as you integrate various (potentially opposing) viewpoints into your own perspective.

My internal debate was about selfishness. I want to say certain things, but then I worry about losing your friendship. So the internal battle was to preserve things, vs speaking what I see. I will choose selflessness and tell you exactly what I see. Because ultimately it's for the best, for both of us. And for him too. For all of us

It's a constant fight against the stress in my head. I certainly don't want to rock the boat with you guys because you're pretty much my only support, but I do feel it's necessary to communicate openly, or there's no point.

And you're prob thinking, but I thought everything was cool. And now I'm whamming you with a 10-page letter, lol. *estimated. Could be longer, idk. But it's nothing bad. It's just observations and a summary of my feelings regarding those situations.

Caryma: My sister once wrote me a multi page letter and then I didn't talk to my family for like four years. So I have learned & grown from that experience lol

Elisa: I'll try not to be your sister and yes, I'd heard that you hadn't talked to your mom for 3 yrs. But 4 is even more serious, lol. So we'll reconvene in 2027

On June 21, 2023, at 6:48 PM, [I emailed a 14-page letter to Caryma](#) and text-messaged her to let her know I'd sent it. Within fifteen minutes, I was blocked on her Twitter account. Later that evening I learned that WASSERMAN was the one who had blocked me – until that day, I'd still hoped for a modicum of privacy and did not realize that **he had access to all her passwords and email addresses, even to the email that she had assured me was private, and that he co-owned the Twitter account.** I also hadn't realized that Caryma deferred to his temper tantrums and ultimatums, to the point she allowed him to hijack her interactions with other people.

The letter, which I sent to SA'D specifically under the condition that it was for her eyes only, was intercepted by Adam Lee WASSERMAN before she had even seen it. It kickstarted a revenge vendetta against me by Lee, which set in motion the events to come.

With "Lee" having blocked our principal way of interacting (X/Twitter Direct Messages), Caryma and I scrambled to find an alternative method of communication. Finally, we decided on iPhone texting as our backup; for longer messages, I would use Facebook Messenger.

The following is a transcript of text messages between SA'D and me in the days following WASSERMAN's blocking of our primary communication channel. This conversation serves to illustrate WASSERMAN's control and dominance over SA'D's relationships, his interference with our ability to freely communicate and meet in person, and shows the beginning of a pattern of SA'D and I hiding our communications behind his back.

It's important to note that upon reading it, SA'D told me she partially agreed with my observations. It was only AFTER WASSERMAN published his libelous [October 7, 2023 article on Substack](#), where he **ADMITS that he blocked me – initially against SA'D's will –, discloses solicitor-client privileged**



communications between SA'D and I, and calls my 14-page letter a "hit piece", that SA'D began parroting the same phrase to police.

SA'D'S 180-degree turn – from telling me she **"partly AGREES"** with my letter, and that **"there was truth"** in it, and it **"came from a place of wisdom and experience"**, to calling it a **"hit piece"** in correspondence with police (i.e. her **54-page letter to 14 Division DC Vigna**) indicates that WASSERMAN likely played a role in coaching SA'D how to lie to police.

SA'D further lied to police by falsely claiming that me disclosing the fact that WASSERMAN seized control of our communications and intercepted my correspondence to SA'D against our consent, as well as his decade(s)-long involvement in the prostitution industry, was "expressing contempt for [her] partner", stalking, and a "fabricated conspiracy" that put her and WASSERMAN "at risk of physical harm" (see *54-pg letter to DC Vigna plus other emails and false occurrence reports*) and required further arrests and criminal charges.

SMS/iMessage Message sent on 6/21/2023 8:40:12 PM

Elisa: I'm sorry. Please don't block me, don't speak to me again but please don't block me. You're my only friend

Caryma: Don't panic, putting out fire set by truth (and a bit of misunderstanding). **I partly agree**, partly don't, but that's everything

Elisa: He wasn't supposed to read it. I wouldn't want to hurt him like that. Sorry I did panic. Was bawling the last 2 hrs

SMS/iMessage Message received on 6/22/2023 8:59:34 AM

Caryma: It changes things a bit. From his POV he tried hard to make you feel welcome & comfortable, even though we rarely invite anyone to interact with us. There's a sense of exposure to vulnerability and betrayal, I think, which probably goes both ways.

So that part is hard, even though the letter wasn't directed at him. **Even though there is truth in some of your observations. I believe your words came from a place of wisdom and experience**, and read the letter in that light— although some of my own pathologies were attributed to him, maybe because I am sometimes an unreliable narrator (not intentionally).

Elisa: **My DMs, email and letter all specified that the communication was private & confidential. If he read it anyway, then there truly is no way I can communicate with you in private, ever, without him reading it anyway.**

If you have to block me to appease Lee, how is this any different from your mother & sister demanding that you end things with him? In both cases, someone else is imposing their will on you and forcing you to sever an emotional connection you've made. If you didn't give into their demands, why are

you giving in now to Lee's demands?

I would never have sent it if I thought he would read it and be hurt. So when you say, it changes things a bit - what does it mean? I'll stay blocked?

Caryma: I don't know precisely how to handle this. It will take time. Certainly distance between both of you.

Elisa: Can he read these texts too?

Caryma: No

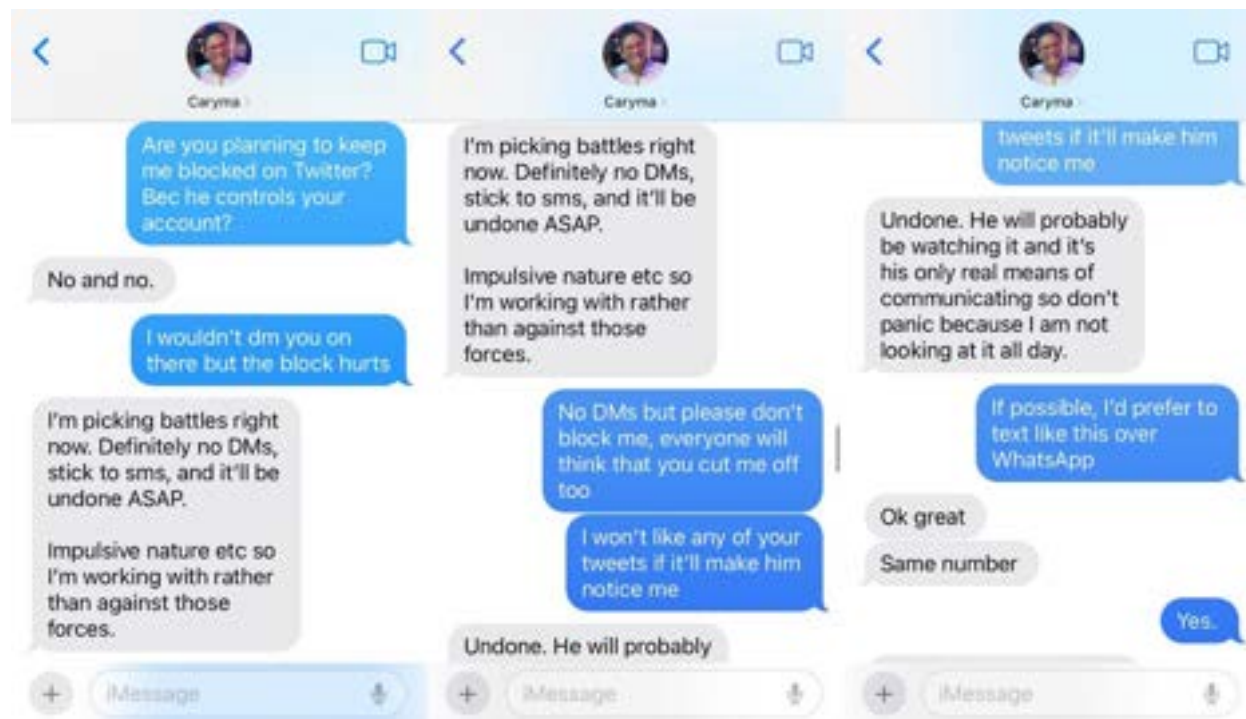
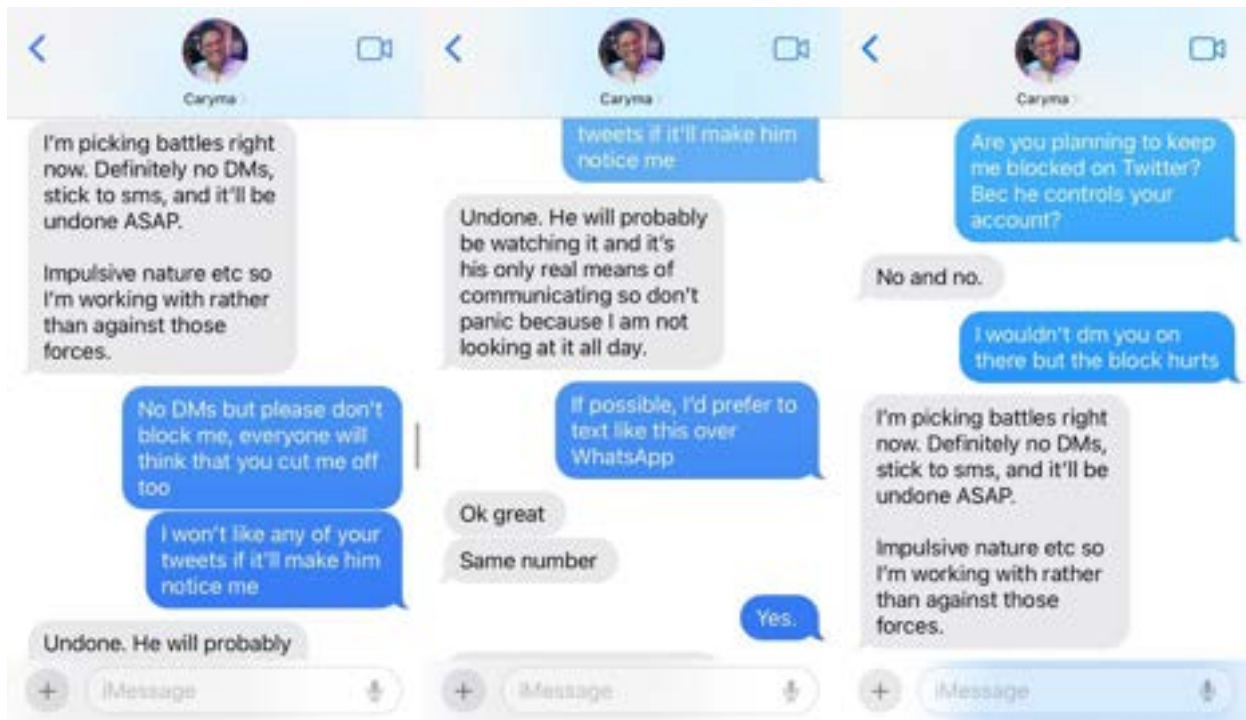
Elisa: Please don't let go

Caryma: 

Do you have WhatsApp?

Elisa: Are you planning to keep me blocked on Twitter? Bec he controls your account?







Caryma: No and no.

Elisa: I wouldn't dm you on there but the block hurts

Caryma: I'm picking battles right now. Definitely no DMs, stick to sms, and it'll be undone ASAP. Impulsive nature etc so I'm working with rather than against those forces.

Elisa: No DMs but please don't block me, everyone will think that you cut me off too. I won't like any of your tweets if it'll make him notice me

Caryma: Undone. He will probably be watching it and it's his only real means of communicating so don't panic because I am not looking at it all day.

Elisa: I'm so upset over this and you can probably feel it, so thank you for texting this morning. I was

still in tears when your text came. Sorry I mean I'd prefer to text here, instead of WhatsApp. I can't stand it, still haven't got the hang of it. I won't follow you on Twitter unless you say it's ok, but thanks for unblocking

Caryma: I don't want you make you cry, or him. Or be wrong about placing loyalty where there's now a conflict. Trust me enough to try and fix this, or at least make it work.

Elisa: The sense of exposure, vulnerability & betrayal def goes both ways. I can totally see how he feels, but again – I've exposed myself so many times in communications not intended for his eyes. So it hurts that all this stems out of a lack of privacy. Although I stand by what I said, and I think his demands that you cut me off are hardly any different than your family demanding that you cut him off. You should be allowed to make your own choices.

Caryma: And I do. It was my stubbornness that created the communication rift with my family. This time I want to minimize the damage part.

Elisa: You know you're my only support system. I can't imagine losing your friendship, I really can't. I know I'm the most expendable chip in this equation. And I appreciate your messages because you'll never know the sense of panic & dread I felt when suddenly I was blocked and cut off. So, thank you for responding.

Caryma: **You are the farthest thing from expendable, but he's my chosen life partner. Still, I've been in worse pickles.**

6/22/2023 11:11:05 AM

Elisa: I can't imagine anything worse than how this feels. He blocked me again. I never clicked follow and didn't like any of your tweets but obviously he checked to see if you'd unblocked me and blocked me again.

The blocking is a psychological tool that makes him feel as good & in control of the situation as it makes me feel worse. Directly proportionate. It's hard to explain what it feels when I see this - it's an instant gut punch.

It's a message that he is in charge of the situation and I am not. Which is a fair assessment. When I first saw it it made me panic bec I didn't know what was going on and that initial feeling of devastation had lingered because I'm still shaken.

I don't live with you, I don't see you more than a couple of times a month at best. This was my main conduit. So he gets to cut it off. But ok we still have texting but it's hard to explain how the block serves as a hit on a different level. Putting me in my place. But he still has you 24/7.

So I'm already punished for something I had no idea he would read. The whole thing feels like an invasion of privacy in the sense that I'm trying to express my thoughts after being reassured it would be private, and then I got punished anyway. I think he'd read in our DMs that I wanted to send you a private email and he looked out for it on purpose. Which again reiterates the points I made in my letter about privacy.

But you're not being neutral here. The fact that you're allowing him to block me on my principal conduit of communication with you says he's already gotten his way. It's not like I'm allowed to meet with you anymore. As pathetic as it sounds, our Twitter and texting is my only line of contact with

you. He loses absolutely nothing - still lives with you 24/7. I lose almost everything. The block also serves to alienate me from you publicly, as well as the protection I felt I had from your supporters.

Caryma: I don't know what I expected in a letter, but if I knew it would be about our relationship I would have suggested it remain unsaid. **I am protecting you, too. The worst thing would be for this to escalate. You can't take the letter back, and now my priority is to ensure no rash response.**

Elisa: Protect me, how? How would it escalate? I mean, what else could he do, forbid you to contact me entirely? It was about the business and the relationship because these two are inextricable.

Caryma: **I don't want to get to the point of ultimatums.**

Elisa: Idk, it feels like it's already there. But yes, I know what would happen in that case.

Caryma: If the situation was flipped around and someone communicated to him about the ways I am possibly stunting his growth (which is only one takeaway, but the mind dwells on negativity), I would be expect them to be cut off. **So far all he wants is to not see you himself— that's the best case scenario for now.**

At the same time, I get that you feel punished for your observations. I wish I had said to just save it for an in person convo, but even then it would have been a wedge. I prefer to not talk about him at all going forward. I can't be neutral and it puts me in a conflict of interest.

Elisa: But how could it ever be repaired if we don't mention him ever again? Is it even possible? So we'll never follow each other on Twitter again either?

Caryma: I don't know if it's possible, but for sure it won't happen if there's no time or space afforded. Give Twitter a couple of days.

Elisa: The only thing I will say about him is that I really do hope he realizes I didn't want to hurt him and I would never have sent it had I known that he would read it and feel hurt

Caryma: And at the risk of sounding overly optimistic, I think finishing the podcast and taking a step towards transcending/longer term goals will have a positive impact.

Elisa: I'm glad he's not opposed to you still doing the podcast

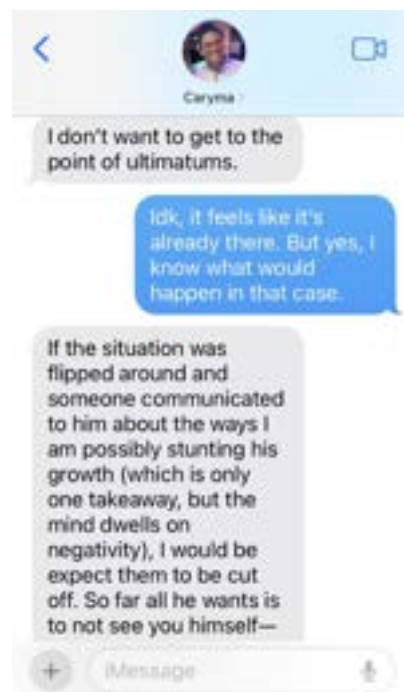
Caryma: **The story must be told**

Elisa: I'm just glad that it transcends the hurt feelings between us

Caryma: It's what brought us together, and hopefully keeps us together. **He gets all flack and so little credit from the world despite being my rock & momentum. That's why the intense reaction.**

Elisa: I understand. Please tell him how sorry I am, even if he doesn't want to hear it. I really am, and there's not really anything else I can say other than this.

I just wanted to add that if it were up to me, he would get all the credit in the world for his work & dedication, which I acknowledged several times. I just want to make sure that whatever hurt/negative feelings he has aren't compounded by something that is outside my control. I've always thought he was talented; any flack he's gotten from others is, again, separate from my own mistake. So I can only apologize for the hurt I caused.



6/22/2023 10:47:02 PM

Elisa: [Emailed you just now](#)

Caryma: You're forever a wordsmith. Thank you, and **I understand. I will try to help him understand too.**

Elisa: I guess he didn't understand since I'm blocked again.

The reasonable approach hadn't made him budge, so I grovelled and debased myself while begging for forgiveness in a second apology letter addressed to him directly, which went unanswered.

6/23/2023

Elisa: I don't know why I never thought for a second that he might read it. **That when I asked you for a private, your eyes-only email, I trusted that it was secure. Never in a million years would I send it had I known he'd see it.**

[...] To lose it all so abruptly, to feel dead to you both, it's panic attack-inducing. All I've had for support was you, pretty much since last September. And it simultaneously kicked me out of the Targets of Vancouverisms group, which now lost me all the messages of support I'd received from that group, and how I felt that it was a mini-support group of sorts. I'm not comfortable with Discord and none of us use it, so that group was also my outlet to share and exchange info.

I just feel cut off from everything and it feels really disconcerting. It's hard to explain how harsh this feels, but it doesn't just reset our friendship to before we ever met in person. Since we connected in 2021 you've been the only way I managed to get through the events that followed. Blocking me to sever a connection we had for at least a year before we ever met in person... I guess I miscalculated just how dependent I am on you.

Caryma: I'm gonna add you back to that group once the **petulant re-blocking power struggle stops (otherwise it'll be a yo-yo situation). I too am weirdly discombobulated**, but please interpret my lack of talking about it as not adding to your plate.

Elisa: No, I'd prefer you articulate because I feel really horrible and down. And it wouldn't feel as one-sided. Never censor your thoughts. Whatever you'd say is better than my own doubts and fears, wondering what's going on etc. It's not just what happened, but having our usual channels of communication affected so our normal routine is off. Having OCD makes it particularly hard for me to adjust to sudden and abrupt changes, on top of everything else I mentioned. I don't throw around the label OCD as is the current fashion, I've actually had it since a kid. Routines and repetitions helped me deal



Remember we were connected since mid-2021, over a year before I ever met him. I think the decision to block me from your own account ought to be yours, and any power struggles over the block button just make the points I thought I'm supposed to be wrong about. And for which I've made every effort to apologize for. And I will continue to apologize for even if it feels futile

Caryma: The account is in my name and I get veto over content, but we built it together. And like a puppy with a toy, trying to grab it away will only make it latch harder.

Elisa: But doesn't he actually get why I need you not to cut me off this abruptly? Like, he's partaken in everything I shared about my vulnerabilities, but is his anger at me or desire for retribution this high? I don't know what else to do to explain.

I prefaced a communication that I was assured would be private with all sorts of disclaimers, and I ended it with an apology in the event that I was wrong. It's clear I emphasized these were views or beliefs I had re the situation, not statements of fact about your relationship. I just don't know what to do but I haven't slept more than 2 hrs in the last 2 nights and it's tearing at me. And I don't want to be accused of emotional manipulation so I didn't disclose how fast it's spiralled me downhill. But it has.

Caryma: Short answer is no, I don't think that's fully understood.



Elisa: I think he's checking periodically to see if you unblocked me and then blocks me again. I don't know how to beg anymore but it's really fucking me up. PLEASE ask him to stop, what am I supposed to do. It literally hurts. Plus I'm scared that they'll know I don't have your protection anymore. I know he's angry but he has you 24/7 consoling him and I have nothing at all.

I can't even eat or sleep anymore bec of this. I'm paying for something that would never have happened had he not chosen to read something I clearly indicated was private & confidential and addressed to you. I don't know how much begging would suffice

Elisa: You were the only reason I even hung on for this long. Maybe I wanted to send you that letter since I'm on my way out and at least I shared whatever I felt I had to get off my chest, because really I'm out of options. But you promised me it would be private. I didn't realize, I had no idea, it never occurred to me that he would look for it and read it despite the email attaching the letter also indicating it was meant to be private. I'm so sorry and I don't know what to do anymore

I didn't realize I would lose everything, not just you but the support group and that I would be exposed again to being alone and everyone realizing that of course you must have cut me off like every self-respecting activist would have by now because I'm garbage and will always be garbage and that's why my own parents didn't give a shit about me

6/24/2023 Elisa: A recap from my POV:

Your boyfriend blocks me from a social media account with YOUR name, because he's angry after he reads a confidential email & letter addressed to YOUR name, and sent to an email address YOU assured me was private & secure – a letter that, among other things, speaks of my concerns over

the privacy of our correspondence (I've written about highly personal things like my abuse, my relationship, my legal concerns & suicidality, via an account he constantly monitors) and also about my fears that he overrules your decisions and berates you until you acquiesce. And now here we are.

If he feels betrayed, how do you think I feel? And yet he loses nothing - I lose everything.

You're my only friend, my only confidante, and I'm entirely dependent on your support. Please open your eyes. I can't take this heartbreak. I really can't.

Erased from my own story, erased from my own sporting scandal article, erased from ARC, erased from White Lies, erased from history, erased by everyone I loved, and now erased from your world. Just like that. Erasure is so simple; what's difficult is hanging on. If it's that simple for the world to erase me, why all the fuss about me erasing myself. It's just hypocrisy to see it any other way.

Caryma: **I should have taken better measures to keep it out of reach,** but his worst fears/instincts were confirmed when it ended up being 14 pages about his faults rather than mine. And from his POV, that's coming from someone he only ever tried doing good towards, including encouraging me to DM with you in the first place (I was reluctant to talk to anyone new due to Trotter infiltrating).

That's why the **reaction is so intense**. The irony is that of a self-fulfilling prophecy, but it's in response to a perceived threat to our harmony. (Again, ironic because it is manifesting in a way that compromises harmony.)

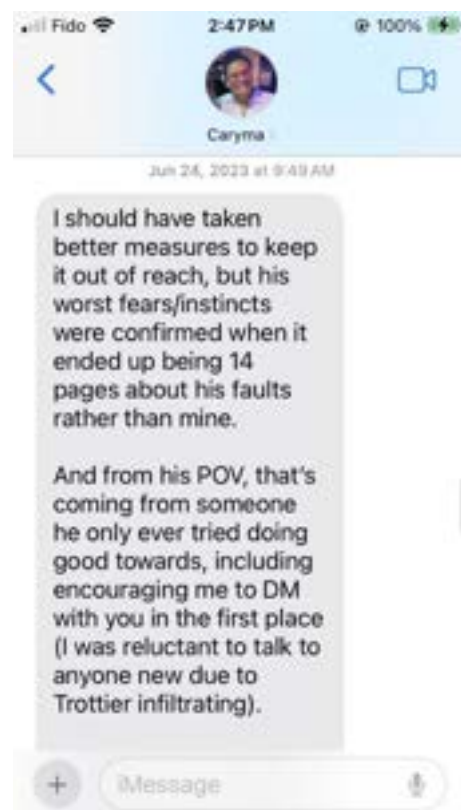
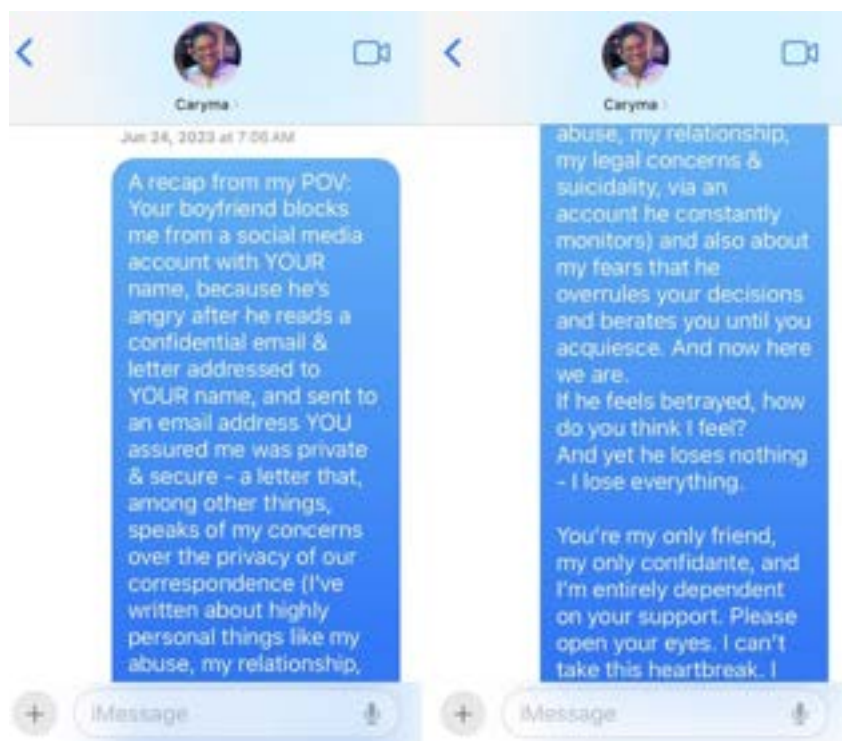
You are both hurt in different ways, and I hate that the common denominator of pain is me.

Elisa: And here's another irony for you: that you want to work on telling my story, while your other half wants me literally erased from his sight. And I am not a self-fulfilling prophecy

Caryma: From his sight sure, but not history. Personal feelings are not overshadowing the bigger picture, at least not at this point.

Elisa: I added to your brand in every way I could. You don't understand

Caryma: No, self-fulfilling prophecy in terms of how **the letter characterized him. Impulsive,**



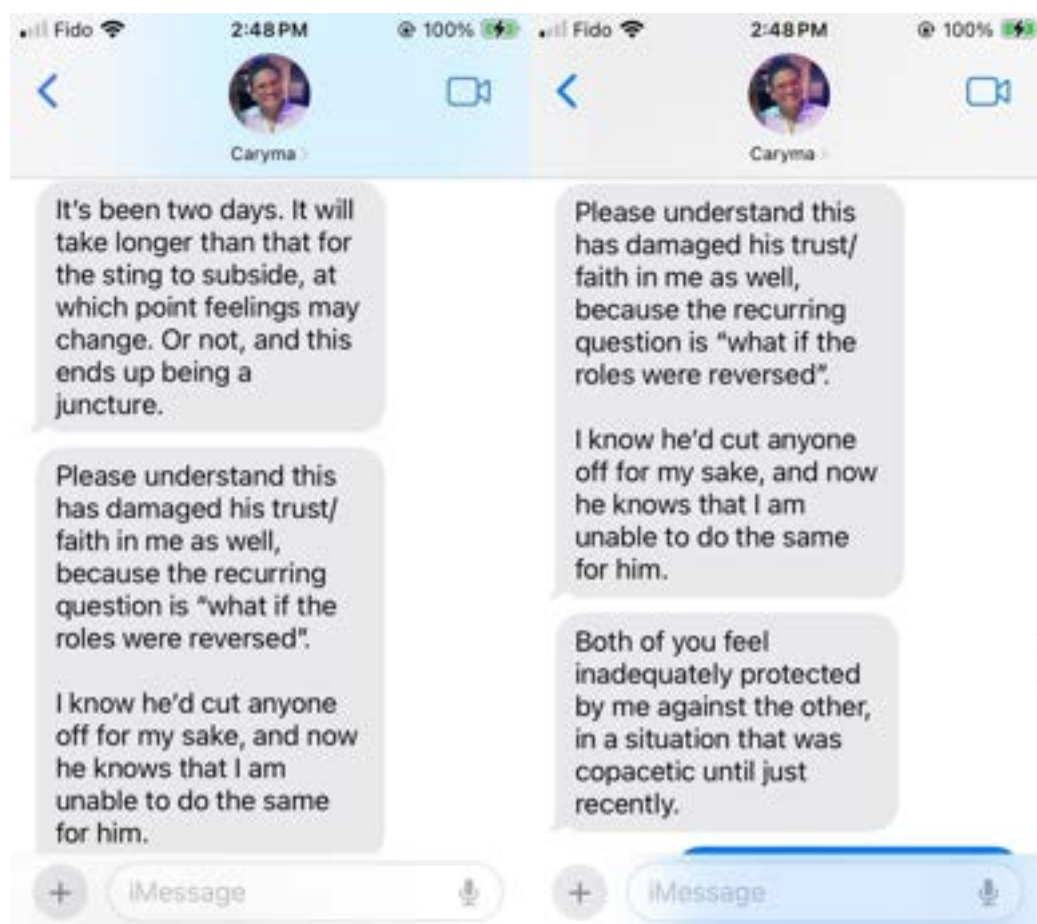
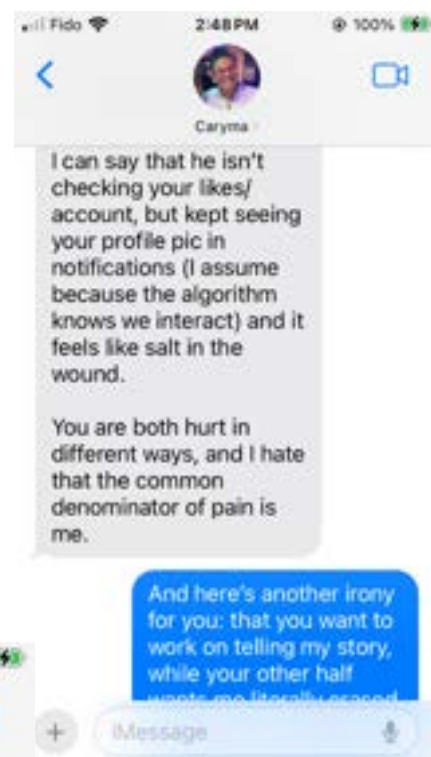
emotional, that's all true.

Elisa: From his sight means from your life. Because you are always a team. And it's impossible to imagine how I can stay friends with you in the long run without his acceptance. And if he is unwilling to at least try to forgive me, then how can I know how wrong I was about him

Caryma: It's been two days. It will take longer than that for the sting to subside, at which point feelings may change. Or not, and this ends up being a juncture.

Please understand this has damaged his trust/faith in me as well, because the recurring question is "what if the roles were reversed". I know he'd cut anyone off for my sake, and now he knows that I am unable to do the same for him.

Both of you feel inadequately protected by me against the other, in a situation that was copacetic until just recently.



August 2023 – Things Go Back to “Normal”

WASSERMAN didn’t just block me on Twitter – he interfered with legal work that SA’D was helping me with. Through the summer, Caryma had given me sporadic feedback regarding litigation involving my old University of Ottawa fencing coach. I suggested that she could be compensated for her time if I won my anti-SLAPP motion and won costs. Five days after WASSERMAN initially blocked me on Twitter, I carbon-copied SA’D on an email with my civil lawyer, and promptly got blocked again.

On June 26, 2023, when I saw that I was blocked for sending legal correspondence we had agreed she would look at, I texted her:

“I just got blocked again for no reason - other than I BCCd you on my email to Joe just now. I wanted to loop you in on our convos since you’ll be billing for the case. I did nothing wrong on Twitter, I’m purposely not even interacting with him so it doesn’t pop up in your mentions. Am I not supposed to email you at your business email??

If you’re billing hours for my case, I thought it would look good that you were looped in on the correspondence at least once. So now emails to you result in an automatic block for me?

[...] I thought your business email belonged to you.

Writing that summary for Joe was difficult enough, I didn’t expect a gut punch from a block because of it. Again, I didn’t know I’m not supposed to email you at your business email, which is kind of difficult since I was going to keep you in the loop when I get their defence back.

You can read the messages or not, I don’t care, but if you plan to bill then you would legitimately have them in your inbox in real time. But saw I was unblocked for a minute and I’m back to blocked. Sorry for committing the cardinal sin of BCCing you legal correspondence.”



There was one surefire way I could make it up to WASSERMAN so he would allow SA’D and I to be friends – earning them money. An idea I’d backburnered suddenly morphed into a timely proposition: creating a non-profit organization which would generate income for all of us. For months I’d wanted to discuss the idea with SA’D, and there was no time like the present. When I received an email about a \$10,000 grant we could have qualified for, I forwarded it to her with a reminder that I’d won several grants, and was good at grant-writing.

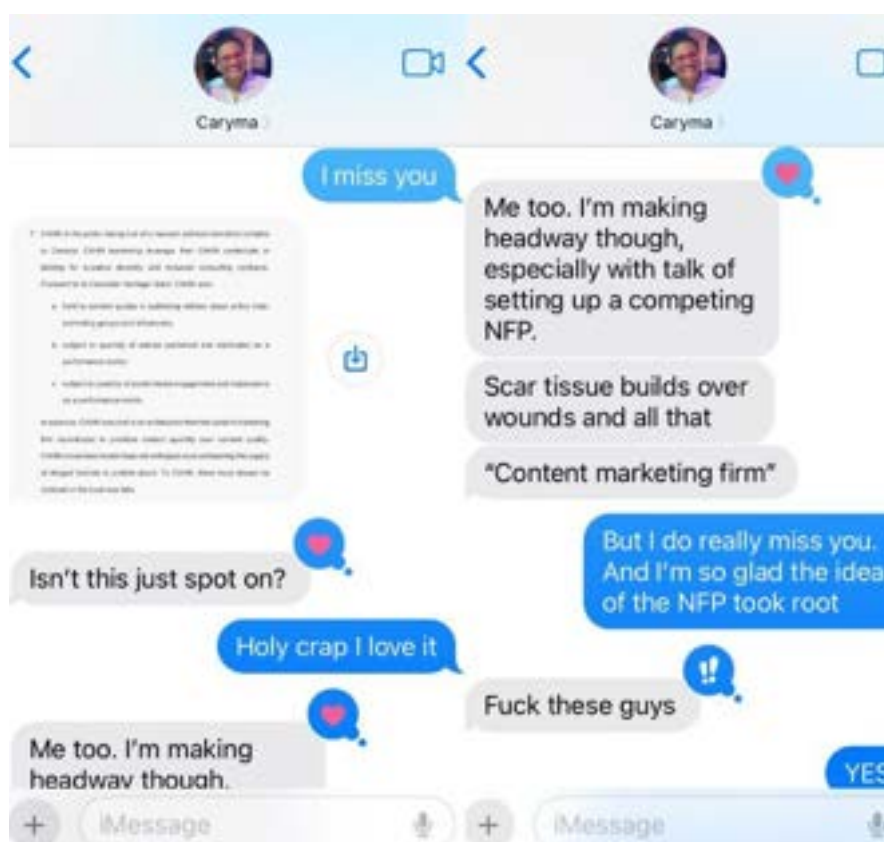
By July 12, our text messages show that SA'D's pleading with WASSERMAN to relent was starting to have the desired effect, and he might permit us to meet again:

SMS/iMessage Message sent on 7/12/2023 5:08:18 PM

Elisa: I miss you

Caryma: **Me too. I'm making headway though**, especially with talk of setting up a competing NFP. Scar tissue builds over wounds and all that.

Elisa: But I do really miss you. And I'm so glad the idea of the NFP took root.



September 2023 – Second Time WASSERMAN Blocks Our Communications

“Please Don’t Quit What We Have”

SA’D and I had planned to hang out throughout the summer, with me subletting one of her two empty rental spaces at the Chinatown Centre so I could have a place to stay downtown, but WASSERMAN kyboshed that idea before his rage at my 14-page letter detonated our summer plans. I hoped that by establishing a non-profit organization, I’d finally earn enough cash to rent my own place and bring in copious amounts of money. How could he resist such a proposition?

As August approached, I grew anxious that WASSERMAN still wouldn’t allow us to meet. SA’D and I were back to texting regularly, so at least our communications were back to normal. WASSERMAN wouldn’t tolerate us DMing on Twitter, but I was finally unblocked.

In August we met to work on the non-profit idea, and discuss the paperwork. I wrote the Mission Statement, and we chose a name the first week of September: the Open Source Network.

By September, we were already working on two more articles, and drafting up more ideas for future pieces. Our biggest hit was The HateGate Affair, which I wrote in majority based on information obtained from FOIPOP documents, and biased information that SA’D fed me which whitewashed her informal client Jeremy MacKenzie’s neo-Nazi, white supremacist views.

We published the article on September 12, 2023, and donations instantly started pouring in – they all went to Caryma’s Stripe and PayPal accounts, and through Make A Donation Buttons website set up on a website she got someone to create. She promised that all cash would be split 50-50, but I never got a cent. She also told me I’d have access to all contacts, but she didn’t share any leads with me, particularly when she corresponded with CTV’s Lisa LaFlamme and did an interview with a top Israeli newspaper – journalistic contacts that would have been extremely useful to me.

As the days passed, I noticed that SA’D kept getting the bulk of the praise, and in numerous situations I received no attribution. It upset me, because it was clear that the majority of Hategate readers believed that SA’D, what with being an extroverted lawyer (rather than me, an introverted, unemployed writer) had to be the principal author. Some people even wrote that SA’D had done me

a favour by allowing my name to be printed on the cover.

On September 18, 2023, I saw that WASSERMAN tweeted links to a blog post praising SA'D, where my name was not mentioned at all. This led to a text message exchange between me and SA'D, where she apologized for his mistake, understood why I was upset, and got him to delete his post.

I thought the problem was resolved, but when I checked my email inbox, I saw that Lee had sent me an **abrasive message from SA'D's law office email address**. The title was *"Please don't be petty around me"*. [The message read:](#)

If you have an issue with the author, then write to her. Don't bring your negativity in my life or Caryma's.

The writer could be someone with the mentality of this gentleman who speaks weekly at the Queens parks rallies.

We need all the help we can get. This is not a matter of erasure.

Lee



I was shocked at WASSERMAN's tone, and specifically his assertion that it wasn't THEIR problem if my authorship wasn't acknowledged, that my distress was just me being "petty" and "bringing my negativity" to them. His failure to grasp why I was upset didn't just lack empathy; it was an insult, after everything I'd done for SA'D. His hypocrisy was breathtaking – if someone had dared to use footage from their videos without attribution, we'd never hear the end of all the bitching and legal posturing about trademark infringements. Why didn't that policy apply to me? How could a "member of our team" so blatantly disregard and invalidate my concerns about erasure?

I immediately text-messaged a screenshot of Lee's message to Caryma.

SMS/iMessage Message sent on 9/18/2023 12:07:42 PM

Elisa: “Don’t bring your negativity in my life or Caryma’s”?! Fuck this. Fuck all of this

SMS/iMessage received on 9/18/2023 12:08:12 PM from Caryma Sa’d (+16133013334)

Caryma: Ughhhhh. He was probably reacting to my exploding at him.

Elisa: Excuuuuuse my negativity. This is insane. I’m done talking. I’ve seen Lee throw shitfit tantrums about your video not being credited. But yeah I wreck my health writing more than half of this thing and I’m bringing negativity into your lives by asking for acknowledgement before that bitch gets web traffic for a piece that wouldn’t have existed without me. Imaooooo. Clearly there’s no getting through. I don’t want to fight about this anymore. Because there’s no fucking point. He will never get it. Enjoy the limelight

Caryma: **I would never say you bring negativity, so don’t attribute that to me. He’s wrong on that point. I love you both.** You’re also very fucking different. I will always address an issue raised. Lee thought the public response was petty, not realizing we were already texting about the article.

Elisa: But calling me part of your “team” is contrived lip service when me getting upset with the fact that only half the team is acknowledged results in “don’t bring your negativity into our lives”

Caryma: That’s the part I just reiterated to him. That the full team needs credit.

Elisa: He instinctively still positions me as an outsider – hence why he turned on me instead of the author. If you were the one snubbed, he would have been mad at that bitch. Instead, I’m the bitch

Caryma: He turned because he thought public squabbling = ammo to antifa. He regrets even finding the article tbh

Elisa: So why post it until the correction had been made? Because you’re trying to pacify me but still DONT GET IT

Caryma: Also his only desire for attribution for videos is my name, and **he knows you’ve helped with ghostwriting in the background.** So he really didn’t expect this to be an issue. Now that he knows it is, he will not leave your name unmentioned anywhere.

Elisa: That bitch is still getting traffic despite snubbing me. There’s no point in fighting because you don’t get it. Done whipping this dead horse.

There is no “team” here. There is you and Lee, and then there is me in my corner. The fact to you’re still pimping Roxanne’s blog despite this exchange confirms this

Caryma: The primary goal is to keep adding content to #HateGate. I’ll delete the post despite the modified caption because you’re worth a million times more than that

Elisa: She DELIBERATELY SNUBBED ME – if it was you, you’d consider suing

Caryma: But we just want to keep the hashtag going

Elisa: We have no team

Caryma: There’s nothing to suggest a deliberate snub but I’m not fighting you on it. It’s gone

Elisa: When she makes the change, you can pimp her shit from here to Timbuktu. Idgaf I’m so burned out. I’m taking a coffee break

Caryma: Okay I have a hearing right now. I am trying my best to keep two of my favourite people from hurting each other's feelings

Elisa: It was his email that cinched it. Now I realize that I will never be part of your team. Go to your hearing

Caryma: He was very mad at the public tweet. You were very mad at the erasure. Neither of you are fully right or wrong, but in this scenario you get precedence

Elisa: It's not the same fucking thing but you will always take his side. Which is what makes this so unfair. I AM fucking right. There is no team, there never was. That you don't understand how I am fully right is the problem. I AM fully right in this scenario. 100%. And it disturbs me that you don't see it. Because you make excuses for Lee

Caryma: Jumping to the worst conclusion is the only thing that I would point out

Elisa: His email – the tone, the words – confirmed that were not a team. Not Roxanne. It was his email. Enjoy the limelight

Caryma: There's nothing to enjoy about any of this. I just want things to be copacetic. And will adjust whenever you need

Elisa: It's his mentality – it's you two against the world. I'm never going to be seen as "us"

Caryma: But that's not my mentality. Not in the slightest. And I can give him parameters so that the team thrives. I have no clue how or why he ticks the way he does. It makes no sense to me. But his heart is good. And likewise, you are an enigma. But your heart is good too.

Elisa: Then maybe be honest with him about how extensive my contribution is to this report. And just because I ghostwrote or edited your other stuff anonymously doesn't mean I'm an invisible afterthought here

Caryma: I haven't been dishonest or misleading with him, but I will make SURE it sinks in. I don't deserve either of you, but here we are

Elisa: I am not an enigma – I've shared so much about myself that I don't understand why you would think I am. Unless you're just saying to create a false equivalency to Lee, in which case excuse me but you are wrong – and other than being highly emotional, I am absolutely nothing like him.

Caryma: No, I've already said you're very different. You're cerebral. The enigmatic part is how you've decided to push forward on something that an objective observer would assume is a losing battle. In that way you're similar, but you think & feel deeply. He thinks & feels in a more reactionary way.

<https://x.com/carymarules/status/1703811290781659372?s=46>

This is his way of asking for truce

Elisa: What you don't grasp - because neither of you are wired that way, and maybe bec you're not as emotional - is that I feel things REALLY deeply. They strike me at my core. It lingers. The hurt doesn't subside easily. The more intense the feeling, the longer it takes me to swing back

Caryma: Yes and him and I are both etch a sketches

Elisa: Sigh

Caryma: Although he's an etch a sketch with a careless kid who pushes too hard, so there's permanent marks here and there. **Like his grudges. I swear to god I try my best to mitigate. But I'm not perfect.**

Keep feeling, it makes you you and you are beautiful as is. Just be patient wherever possible with us ding dongs

Elisa: That emotional well, and its bottomless range, is where my talent comes from. It feeds the energy of creation and making something from nothing. But it also means there is no bottom when I fall. Anyway, it's not like I plan to stick around after next year. But until then, I'd like to draw the line at not acknowledging the work of those who don't acknowledge us – and pls allow me to define the word – by us, I mean both authors of this piece.

(Unless acknowledging them means threatening them with legal service rather than praise and web traffic.)

I'm not fond of Sask Today's summary description of me so I won't be RTing your tweets. But I accept the apology.

If this keeps happening, rather than blanket/quoting an author describing me as an ex-white supremacist loser who made good, perhaps a blanket acknowledgement of me as the co-author of our article might make the point more effectively. It's precisely because of my background that people don't realize my name on the Hategate piece is not just a nicety on your part

I'm not trying to continue being a bitch and I accept that it's his way of calling a truce, but the point is about authorship, not reiterating that I'm a former white supremacist. I think I'm getting more and more upset in my attempts to explain how I feel, that it's just useless.

I'm just not going to tweet anything and try to move on with the day

SMS/iMessage Message received on 9/18/2023 1:23:35 PM from Caryma Sa'd (+16133013334)

Caryma: He can't do that because he doesn't compose from scratch, but I was already working on something.

He is pretty much limited to copy & paste because I'm a control freak. But his intent was to spotlight you.

Elisa: Again, not the spotlight I wanted. It's so frustrating I can't explain or convey this

I'm composing a tweet about my book. I'll be glad for an RT. Nothing else Just posted it. I'd appreciate an RT. And if not, I don't really care. Honestly. There isn't a passive aggressive bone in my body. I truly don't care.

I appreciate the corrections and the messages from Roxanne you forwarded me just now, thank you. And I truly don't want to talk about it anymore. Save for one thing:

Lee's email didn't say, "pls delete your tweet - we want to show a united front and not give them any ammo". That's what a normal person would request, under the circumstances. But no. He took it WAY further – "Don't bring your negativity in my life or Caryma's" is much more than just that.

I appreciate your corrections but this negativity line hit really deeply.

My "negativity" is because of what those mofos did to me. And what I literally experienced – the pain, the agony of redescribing it on paper, and TRUST me that I felt every word like it was carved into my flesh – while you two were filming videos and getting publicity in Ottawa. While I couldn't sleep more than a couple of hours, while writing and sobbing at the same time through so many parts of this report.

My negativity is why you're still not sifting through those FOI papers right now.

I don't think I have it in me to be on Dean's show today, not that he even invited me lol. So here's me bowing out of something I wasn't even invited to, lol. But hey, the upside is there will be less of my negativity there and more time for you guys to enjoy the spotlight.

Caryma: Dean did invite you, initially when he ghosted me last week and again today. But no pressure if you're not up for it. I'll keep you posted on every podcast appearance (there's two on the 21st) and you are always welcome to join – if that's an issue with the host, I won't do the show either. I'll send you the link for today in case you change your mind because your perspective is valuable, otherwise I have it covered.

Elisa: I'm not doing it.

Caryma: Ok

Elisa: And there is no more team, Caryma. I don't think there ever was. It was always you and Lee. Good luck. I'll take my negativity out of your lives

Caryma: You know I didn't sign off on that or endorse it, and it doesn't represent how I feel at all. You didn't pick Lee, I did. So I guess it's my fault in that sense.

Elisa: Just think of my co-authorship as an insufferable land acknowledgment- something you kinda have to mention for pc reasons even if you don't feel like it

Caryma: You know that's not how it is though. Surely, you must.

Elisa: I'm not going to sully the wonderful partnership you have there with my poisoned pen negativity. He doesn't fucking get it, Caryma. After everyone I've done for you, his words show he doesn't value me. He doesn't get it and you indulge him tremendously. You don't understand, or you would get it. I can't do this right now. Maybe we'll work on other stuff in the future but right now I just feel devastated and I can't handle it. There is no more team. There never was

SMS/iMessage Message received on 9/18/2023 2:55:07 PM from Caryma Sa'd (+16133013334)

Caryma: I don't think it was a figment of my imagination. The synergy, how our thoughts meld

Elisa: Because you cannot grasp the agony of what it took for me to do this, and you cannot seem to convey it to your closest team partner

Caryma: My closest team partner and I have been at each others throats all summer. So no, I'm struggling to convey stuff as it is. He hasn't read the report!

Elisa: Stop making excuses for him!!!! He damn well knows by now what I've invested into you

Caryma: It's not an excuse. It's an illustration.

Elisa: But he is selfish. In his mind I'm yet another peon to use in launching YOU as a brand. He doesn't grasp that a true partnership is needed for this to go far

Caryma: Sure. In many ways. I can be too. He also is largely invisible, which takes its own toll. And he should have been able to understand as a result.

Elisa: Ok. Just let me cry in peace. We'll talk later

Caryma: I work around his shortcomings, same as he does mine. And yes, we predated this whole CAHN mess. The dynamics are all fucked yo.

Elisa: Sorry but I'm too negative to write anything so you're in your own

Caryma: I value you beyond your writing or editing or even as a soundboard. It's inherent, and I

know you know that. Even if you aren't saying or feeling it right now.

You and him are not a team without me in the middle, sure. And my relationship with each of you is complemented by the other's brilliance. **I hate that he was careless in his expression, and hurt you. For that I am endlessly sorry.** But the three of us share the same vision of destroying the same enemies and making something nice for ourselves in the process.

Elisa: It's more than fighting common enemies. You became my muse – the connection and synergy is intense and I tap into it when I create.

I have strong feelings for you. This goes into our joint work. It's all energy transmutation and I'm a master artist when it comes to it. But it also leaves me way too open and situations like this remind me of that vulnerability.

Caryma: I'm his muse too. You both are insane tbh because I am not special.

Elisa: Yes you are. Because to say otherwise insults my taste and intelligence lol

Caryma: Like I said. You're both nuts.

Elisa: And I can't speak for him but I know he'd agree on this one. I even anticipated what you were going to say about common enemies and I already wrote you the reply the same moment

Caryma: Lol that's what makes the team a trio

Elisa: Because of the link. But for me it's also a curse though

Caryma: **But you and I connect deeper beyond that**

Elisa: We are not a trio. You are the centre of the Venn diagram

Caryma: The common enemies, yes. Beyond that, I guess not. As much as I want it to be

Elisa: And him and me *are* mutually exclusive. His words make that clear. It's you and his lives that my negativity would affect. So let's not kid ourselves either. Anyway, I think we've both said our piece and I need time to regroup

Caryma: **He doesn't speak for me**

[EH NOTE: This is the reason why I continued to message/email her after WASSERMAN blocked me. Because I wanted to hear it directly from SA'D – and I worried that he was deleting my emails since he controls her emails/social accounts]

Elisa: I know this

Caryma: And him not understanding how you enrich my life doesn't make it less true. CAHN killed our relationship too. It's never been the same, I imagine similar to the effect the lawsuits had on you & Claudia, but less compounded because of shorter duration of time. So there are ways we fail to connect or understand each other. We push on, optimistically or foolishly. Who knows. Out of necessity? Anyway, regroup. I understand, **I'm sorry, but please don't quit what we have.**

trip to track down former SS soldier Yaroslav Hunka (the old Ukrainian Nazi who got the standing ovation in Parliament), my ex-partner and I were on the road, driving back to Toronto. Caryma and I text-messed most of the way. Everything seemed copacetic. I asked how her afternoon settlement conference with Danny Taro had gone and she boasted that he'd squirmed the whole time. *"We are gonna wreck him,"* she wrote. By dinnertime, however, I checked into X/Twitter and saw that I had been blocked from her account. I panicked.

iPhone iMessages 9/29/2023 6:09:32 PM

Elisa: Why did I get blocked again???? What happened? That really shocked me. What's going on? Can you pls tell me what's going on, because that was a really bad jolt.

We're still driving back but we'd stopped by a reserve and I'd literally just walked out of a dispensary with a bunch of gummies, some of which I'm giving you, and then I saw that and thought "What did I do?!"

Caryma: **Nothing, you didn't do anything. It's a punishment for me**

Elisa: Wtaf

Caryma: I still need to finish Deana's affidavit and **lee is being petty**

Elisa: **So he's punishing you by blocking me????** No he can go fuck himself. It's not punishment for you to block me, it's punishment for me too and I didn't do anything. This is so immature I just can't even talk.

Caryma: **Sorry for you being caught in the middle. He is being irrational saying I'm texting too much to finish it**

Elisa: Here I am trying to get into the right gear and state of mind, after all the abuse over the last few days, and he pulls this? Fuck this

Caryma: **Please don't be thrown off by our strife. He also has his own state of mind issues.** And it



shouldn't affect you. He just went off the handle and it's partially on me for procrastinating on Deana. I could have worked on it in the hotel but preferred to hang out.

Elisa: No I am done dealing with him. This is not a team, he is a dictator berating you in public, literally insulting you in front of me and that driver, commanding us around like he fucking owns the place when that \$1500 wouldn't have happened were it not for my fucking work. And your work. I mean, what the fuck did he actually do for HateGate? I bet he still hasn't even read it.

This is not how adult people work together. I don't feel like I can depend on someone who pulls this shit. He doesn't think, and you make excuses for him. I'm going to write the article but I'm fucking done after this. This is insane and ridiculous. I am suicidal and you are my lifeline and he thinks he can do this. Fuck all of this.

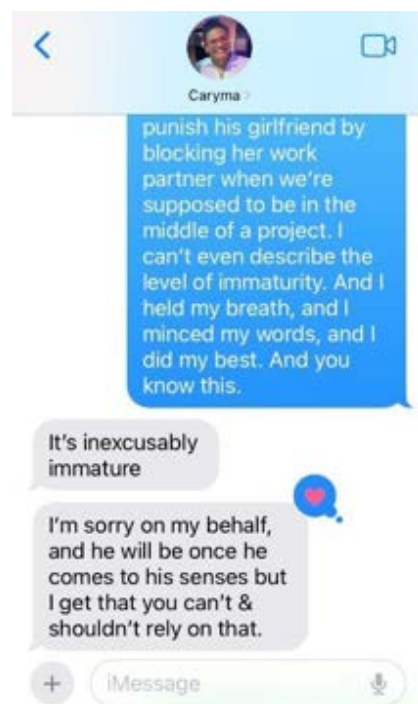
You are not a child to be punished by your boyfriend. He is not your jailer. He is not my dictator, because I didn't choose to be in a three-way relationship with all of you. This is supposed to be a working relationship and I need to know that I have a dependable team backing me. Not someone who's gonna **punish his girlfriend by blocking her work partner when we're supposed to be in the middle of a project.** I can't even describe the level of immaturity. And I held my breath, and I minced my words, and I did my best. And you *know* this.

Caryma: It's inexcusably immature. I'm sorry on my behalf, and he will be once he comes to his senses but I get that you can't & shouldn't rely on that.

Elisa: Sorry for any typos, I'm dictating this because I'm too upset to type. But it hurt me to see how he treated both of us, but especially you. Because at the end of the day, I can leave and go home. But you're stuck in that environment permanently, and I find it heartbreaking.

But because I actually stand by my words, I am going to finish this work. And I'll be amazing. But the way this is going, I don't see how we can work long-term. And to be frank, I don't think anybody could work with him.

God knows I have tried my best, but this is unfair to me. And the fact that he doesn't have respect



for me, like turning on all the lights at 7 am and talking loudly to the dogs and not letting me sleep for a while, on purpose, even though he saw that I was sleeping in the front and I had stayed up late working. This is just one of the many tiny little acts of disrespect and immaturity I didn't even want to mention.

I believe he feels some kind of rivalry toward me, and this is in my view. But I believe he feels he has to put me in my place, and these are the kinds of things he does. This is not how I work with people I count on being dependable teammates. This is not how you show respect to people who are doing work like this for free, whose work in fact provided you with the creative work that drew enough attention and led to funding to even go to North Bay.

You don't have to say anything. In fact, I'd rather you don't try to explain because we both know the situation. And what could you say anyway? You've suffered enough as it is, and now that you're punished you don't need to add to it by trying to pacify me as well. I'm not Lee and I'm not gonna do that to you. Don't worry, will write the article and figure out a way to work together without him. And if he can't allow that to happen, then you need to reevaluate your own priorities.

I love you - unconditionally, without expectations or demands, and it physically hurts me to see you treated with so little respect. I was tearing up at the bus station about it. I don't even tell you half the shit I feel and think. But it's not right.

Caryma: I know

iPhone iMessages 9/29/2023 7:41:29 PM

Elisa: We just got home now, I logged into my email, and get this. This is what he sent me right before he blocked me on Twitter. I think he's trying to hijack the photo of you and me and threatening to delete it from the account if I do not comply.

I'm having a hard time deciding to either ask you to delete your MAID thread or me to just go ahead and delete the picture with you and Caryma outside of Rota's office.

The suicide situation and working with Caryma is not cool and I need to talk about it because I'm not happy.

Lee

I am angry. I am upset. I am suicidal. And at this point, if he has so little



respect for me and the work I have done, without which you would not have even been in North Bay, that he can pull such a maneuver on me, then what is the point. Not even one single sentence of sympathy, of understanding, of anything. Just – delete your post or I will delete that popular viral photo of you and Caryma. Does your abrasive, emotionally abusive boyfriend thinks that he can threaten to delete our photos together as some sort of a dig at me?

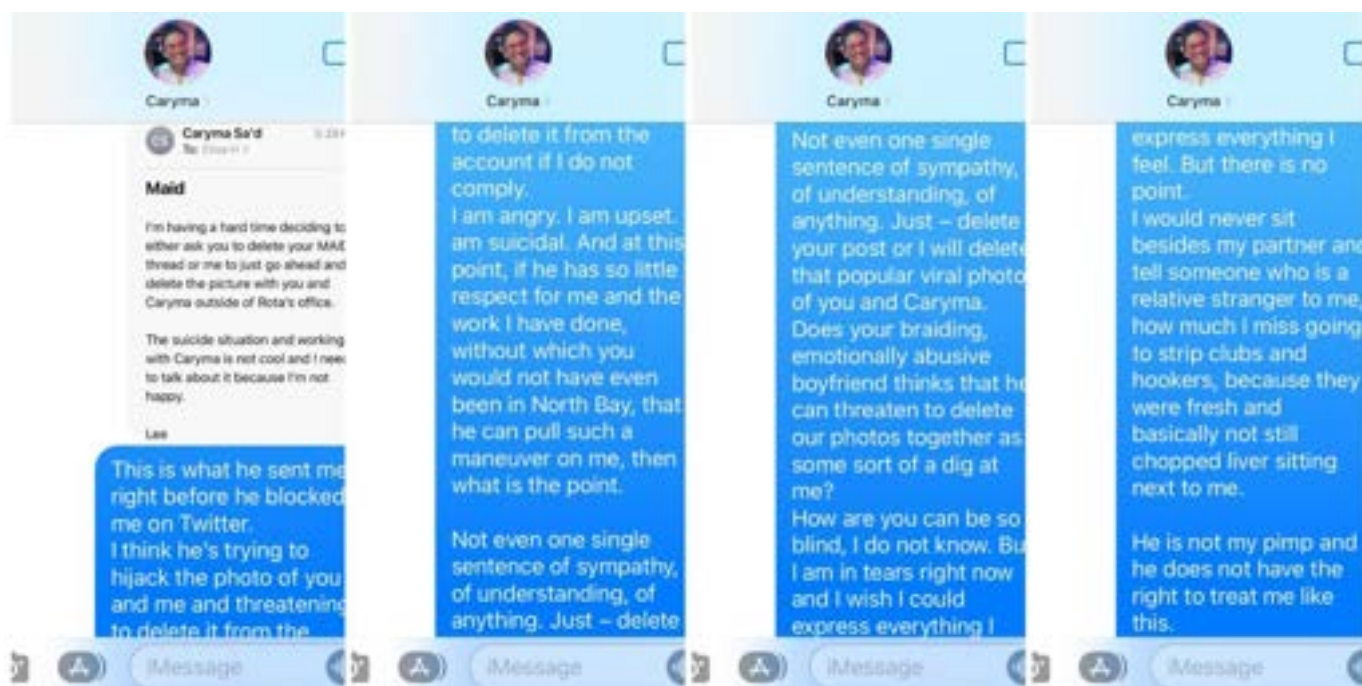
How can you be so blind, I do not know. But I am in tears right now and I wish I could express everything I feel. But there is no point. I would never sit besides my partner and tell someone who is a relative stranger to me, how much I miss going to strip clubs and hookers, because they were fresh and basically not still chopped liver sitting next to me.

He is not my pimp and he does not have the right to treat me like this. At this point, given his message, I don't know if I can write this anymore. He thinks he owns us both. The more comfortable he gets with me, the more abusive he is. But he doesn't have seven years of gradually eroding my confidence and trust and getting me to depend on him for emotional support and secretarial work. This is emotional abuse, pure and simple.

If he deletes my photo, I will call him out on it. And publicly. See, I can make threats too. This is not how you talk to someone who has dedicated her time, effort and energy, and future connections, to help you. Much less when they are suicidal.

I am not going to allow Lee to emotionally abuse me the way he does you.

He does things out of spite, he tries to cut people down, he tries to isolate you so he is the only one in control of your life. What can you do to me? Delete every reference to me from your Twitter feed? Every photo of us together? If you allow him to run your life like that, to the point that he obliterates my presence, then you have already chosen your path.



In the future, how can we go to do talks together? If they're in town, it's fine. But going out of town, or even travelling abroad, he will insist on following, on being in the room at every moment, on watching, dominating and controlling every second of our work together. This is not a partnership, this is control and he is not my fucking pimp or my dictator.

Go ahead, delete every photo. Wipe out every message. Pretend I never existed. Just to please Lee. Because that's the person he has turned you into.

"Because I'm not happy" - Who the fuck behaves this way? Who speaks this way to another person?

Oh, and that wasn't the end of it. Then he sent me a second email with a screenshot of what Gigi was saying about me. Because you want to send more abusive messages to an already suicidal person, to drive the point home that if you don't do what I say, because I'm not happy, I'm going to delete photos of you and Caryma. Because he thinks that I am so in love with you, that I would actually give a shit that he deletes a photo that I don't even like of myself? This is so insane. WAKE UP

I saw my father emotionally abuse my mother and myself. I saw how he beat both her and me. And how she also hit me. I don't do emotional abuse.

For him to send me a message that Gigi [*Gisela McKay, one of Caryma's biggest critics*] said about "who won't be sorry for her when she's gone", is cruel and abusive.

Good luck getting your boyfriend, the man who didn't even read Hategate and who didn't even earn the money that paid for our trip to North Bay, to write the article for you. Because I am done. I love you, but I'm not going to be abused – if I can't open your eyes, then I have failed anyway. I hope that someday you will realize this. And that you will save yourself.

I expected Gigi and the rest of those guys to send me abusive messages that reinforce my suicidality. What I didn't see coming is Lee doing that to me.

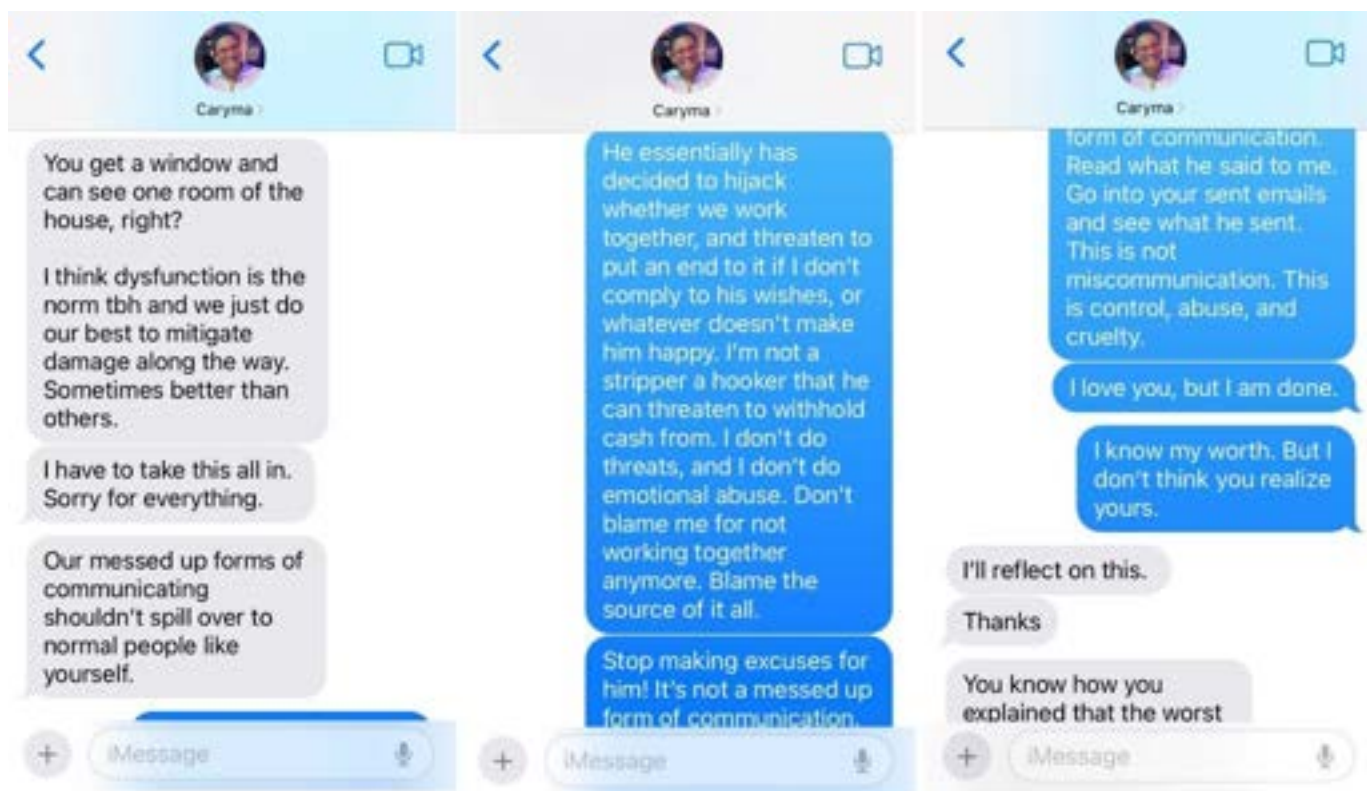
Wake up. Please wake up and save yourself.

I am a free woman. Except I don't think that you really are a free woman.

SMS/iMessage Message received on 9/29/2023 8:18:33 PM from Caryma Sa'd (+16133013334)

Caryma: You get a window and can see one room of the house, right? I think dysfunction is the norm tbh and we just do our best to mitigate damage along the way. Sometimes better than others.

I have to take this all in. **Sorry for everything. Our messed up forms of communicating shouldn't spill over to normal people like yourself.**



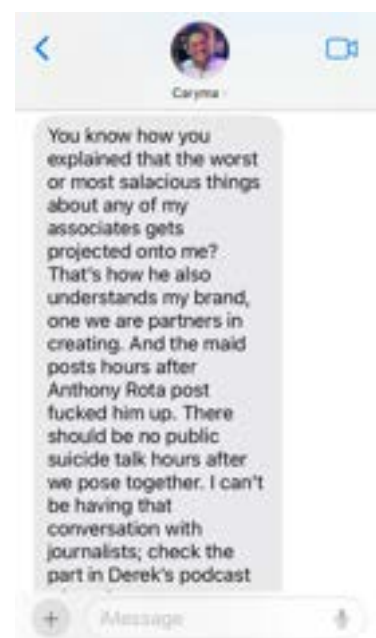
Elisa: He essentially has decided to hijack whether we work together, and threaten to put an end to it if I don't comply to his wishes, or whatever doesn't make him happy. I'm not a stripper a hooker that he can threaten to withhold cash from. I don't do threats, and I don't do emotional abuse. Don't blame me for not working together anymore. Blame the source of it all.

Stop making excuses for him! It's not a messed up form of communication. Read what he said to me. Go into your sent emails and see what he sent. This is not miscommunication. This is control, abuse, and cruelty. I love you, but I am done. I know my worth. But I don't think you realize yours.

Caryma: I'll reflect on this. Thanks.

You know how you explained that the worst or most salacious things about any of my associates gets projected onto me? That's how he also understands my brand, one we are partners in creating. And the maid posts hours after Anthony Rota post fucked him up. There should be no public suicide talk hours after we pose together. I can't be having that conversation with journalists; check the part in Derek's podcast where it comes up.

When we go out of town it's a hustle. So him and I were pissing each other off over schedule.



Elisa: It wasn't hours after. It was an entire day later.

Caryma: He didn't see it. Today we get all these DMs & phone calls. I'm not making excuses, but like your incorrect assumptions about being deliberately snubbed by a podcaster who accidentally left you out, you are honestly mistaken.

Elisa: It doesn't matter. All I see is justification, rationalization, and more defence of someone who is needlessly cruel just to be controlling.

There is no justification for his behavior. Neither toward you, or toward me. You trying to make that excuse still doesn't diminish an iota of angry and betrayed I feel. He didn't give a shit about me, just about your image. He threatens to delete photos of me and you – not the videos mind you, only the photo of me and you – and to potentially limit our work together in the future, if I didn't do what he said.

I realize that after seven years of being emotionally bullied, dominated, controlled and yes, downright abused by this man, you don't see it. But I do. And I implore you to save yourself. To put hard boundaries in place for what he can do and say to you. Or on your behalf.

Caryma: Because just like the James Bowie photo, every negative move is projected onto me a hundredfold. It breaks my heart you see it that way because even with the stressors of all this we would take bullets for each other.

Elisa: It actually breaks my heart to see how he treats you. And also how you still defend him, at my expense.

You don't have to say anything. In fact, I'd rather you don't try to explain because we both know the situation. And what could you say anyway? You've suffered enough as it is, and now that you're punished you don't need to add to it by trying to pacify me as well. I'm not Lee and I'm not gonna do that to you. Don't worry, we'll write the article and figure out a way to work together without him. And if he can't allow that to happen, then you need to reevaluate your own priorities.

Caryma: I will take you up on this. I need to think.

Elisa: You're beating a dead horse. You can make all the excuses in the world for why you feel that my emotional post may not have been the right move. I disagree. But I still haven't heard a single excuse for how and why Lee was so controlling and abusive. Why he sent me hate mail from Gigi. Please reread every single word I sent you in the last couple of hours. There's no point wasting my breath anymore. Because you don't have any excuses. Because there are none.

If your first impulse is to write me again with some sort of justification or diminishing of Lee's responsibility, because he's emotional, because he doesn't get enough credit, poor thing, because he got stressed out and lost it, but it's OK, he's just an angry puppy, please don't bother. I've heard it before, and I don't buy into any of it. But then again, I haven't been emotionally abused by this man for 7 years, nor do I wish to have someone this cruel and insensitive in my life.

Caryma: I haven't been emotionally abused for 7 years either. He sent you Gigi's post because that's how he found out about your situation. That is how the haters react to things like that. So right, move or not, our friends are connected for the time being, and that kind of thing gets projected onto me.

NOTE: Gisela McKay's lone post on Mastodon, which had no engagement whatsoever, was a contrived excuse. Lee was obsessively on Twitter, day to night. He had already seen my post, because our mutual followers were tweeting to both Caryma and me about it. His freakout temper tantrum was not about my suicidal ideation. Lee simply wanted to have power and control over both of us. He wanted me to obey him command to delete a MAID post he thought looked bad on Caryma's brand. This was about control and dominance; nothing more or less.

Lee could not see himself as the man on top, the Wizard, the Phantom, the talent agent in charge of everything, if he couldn't dictate how we behaved. He would never allow me to be his equal, or respect my right to make my own decisions, if it meant that Caryma might be swayed to listen to me over him. What if she started to believe that I was right about something he did wrong? He was so breathtakingly insecure, there was no way he could tolerate someone else having equal say, or overruling him on anything, without revenge.

Elisa: You are not a free woman, because you are enslaved to the temper tantrums and hissy fits of a man who cannot control his own behaviour, a man who is shockingly cruel, callous and insensitive to someone who has dedicated themselves to benefitting you both.

And I am heartbroken again, because I realize now that you are not a free woman, because you cannot make your own decisions without his input and approval, that it would be impossible to work together. Because I cannot work with you adult-to-adult, without his controlling behavior, without him asserting his dominance and control over both you, and our working relationship.

Caryma: He is only ever on Twitter, searching my name, not looking at anyone else's post or threads. So that's how he found out about it. 24 hours later

Elisa: I don't fucking care, Caryma. So what if Gigi rants about me on Mastodon? It's how he handled it, the cruelty in his response, in his comments, in his words, his attitude, and how he treated me this past weekend. And how he treated me even today.

Caryma: I disagree with these characterizations but you're right about beating a dead horse.

Elisa: All you do is defend him, over and over.

Caryma: You are missing the point

Elisa: And so are you. You're getting defensive and angry at *me*, when I am angry at *him*. For what he did. That is the point. I think you are so influenced by Lee that you don't even understand how shockingly callous and cruel his message was. And how him blocking me without warning reverberated another shock to me. You are really that disconnected from reality. I don't want to fight with you, because this fight is not about what some thing you did, but something you *didn't* do. Which

is open your eyes. And see what really happened here. I didn't do anything wrong.

Let me say it again. I didn't do anything fucking wrong here. That's it. That's the message.

Caryma: Okay Elisa. I can't fight you either. But I will always fight like hell against CAHN, the fake boys, and to uplift your story in your words. Always.

Elisa: You will fight like hell against all of them, but you won't fight your boyfriend when he is cruel, demeaning and callous toward me. Lol

Caryma: So of course I will do damage control

Elisa: Caryma. I don't need your words. Words are cheap. Your actions speak for you. HateGate in its current form wouldn't even exist without me. At least half of it wouldn't even exist without my research. Let Lee write the next articles for you.

Caryma: And you'll always get credit where it's due

Elisa: I am nothing to him but a vehicle to promote you. He is cruel and indifferent toward me, and chastises me abusively, without one single word of empathy. Not one word. I got more supportive messages yesterday from complete strangers. Let that sink in. Complete strangers were more sympathetic and empathetic to me the Lee has been. Let him be your writer.

What a great lifeline you have been. I don't fucking care about your "damage control ". Hategate is my fucking testament, assuming I even make it to next March. Now leave me alone

Caryma: He shows empathy by driving a 2L Diet Pepsi up the hill. I sheltered you from mine and other negative reactions to the MAID post, which if we are honest with ourselves distracts from the story as we chase momentum. He sent an unfiltered reaction (tied to deleting a post he suggested making that had significant traction, not to hurt you but to show how it hurt perceptions to be posting that in the morning and suicide in the evening), and evidence of the damage as seen in gigis post, where he found it. You may never accept that explanation but I need you to understand it wasn't cruelty.

Elisa : Yes it was cruelty. Absolutely abusive. Please stop texting me

Caryma: Okay

Elisa: I don't expect you to understand, but even Jeremy had more sympathy than Lee does and he doesn't even know me

Caryma: I'm sorry for not being a better intermediary

Elisa: Please stop defending him. Everything you say in his defence is another cut

Caryma: I will read all your words again

Elisa: Stop. Every single thing you wrote me tonight, every word was nothing but an amplification of his abuse. Stop it. It is clear you don't understand. Not in the least. Not an iota. And I don't know how else to articulate how I feel. So just stop it. It's pointless

Caryma: I don't want to do that so I'll stop

Elisa: You don't know what he did to make me as uncomfortable as he could during our stay. You don't know how he acted in front of strangers while berating you. I appreciated the groceries and Coke. I really did. I didn't appreciate him making as much noise as possible at 7 AM, turning on all the lights and talking loudly to the dogs before he took them out, not turning off anything behind them. I had to get up and of course I couldn't sleep again. Functioning on 3-4 hours wasn't easy. The tone of his email, the messages, sending me that screenshot, everything. I don't know how you can be so blind, but I am not. Just stop defending him. If you cannot do that, please stop texting me. I am begging you

Caryma: Okay

Elisa: Everything you have said to me tonight, every single word, was a defence of him. Fuck, neither of you even apologized for his emails lol. Just stop texting me if you can't stop defending him. I didn't do anything wrong. And until you understand that, and by this I mean you fully grasp it, there is nothing left for us to say to one another.

There is no walking this back unless there is full accountability. STOP I see you typing, and I am begging you to stop it. Lee did something wrong. And I did nothing wrong. And this is all of it. And until you understand this, there's nothing left between us. Lmao he blocked me again. And here you are typing apologies for him

Caryma: Until you understand the ramifications of the MAID post it is an impasse. That's part of full accountability that I am not equipped to broach.

Elisa: I expected you to defend him, but I didn't expect the extent of your own cruelty. There is no impasse. Hategate wouldn't exist without me. Almost all the articles you have written in the past year have been due to my suggestions, edits, or straight up ghost writing. You guys don't even give a shit if I live or die, as long as it benefits you.

Caryma: You know that isn't the case, so I'll just reiterate that.

Elisa: Yes. I am absolutely convinced this is the case. The fact that he blocked me, after emotionally abusing me in his emails, sent under your header, while you were busy defending him and scrambling so that I can help you with your article, is a joke. You don't give a shit if I live or die. You just want somebody to write for you and make you more famous.

Caryma: The articles are a bonus that I thought benefitted is both. I'm sorry if that wasn't the case, and can credit your editing & writing on each. I thought we were collaborating.

Elisa: You don't feel the same way about me, so you don't understand how this feels. But trust me, this is my Rubicon. And you have shown me how much you care about me. You didn't even care to organize people's complaints so that we could take down Brett. You don't give a shit about how Lee treats me. You don't even give a shit about how he berated you and humiliates you in front of others. Honestly, I know you'll be sad when I kill myself, but that's because you'll have lost a source that could benefit you

Caryma: I don't have the bandwidth for endless litigation. Brett has been overwhelming to look at. I

don't believe you think it's because I don't care? There's a dozen Bretts right now

Elisa: I don't care, Caryma. After everything I've done for you, for Lee to block me? I am this close to telling him off in public. Please stop this. Stop it stop it stop it stop it

Caryma: Okay I'll exit this convo for now.

Elisa: It's not for now. Until you understand that I did absolutely nothing wrong, and your boyfriend was cruel and emotionally abusive toward me, and all of this is because of him, there is nothing left for us to discuss or collaborate on. How can you let him treat me like this, and spend the last couple of hours defending him instead of seeing the truth. It's not just what he did to me anymore. It's how you handled it that also makes me realize what this was all about all along.

Caryma: You keep saying boyfriend but that's also my business partner right

Elisa: That I'm a piece of trash that you can just throw away and block whenever it's inconvenient. That you can delete videos or photos of me when he is not happy. That he can dictate whether we can work together or not. And you have the nerve to call yourself a free woman.

And I thought I was also a collaborative partner. But I am the disposable one. And he's already blocked me and thrown in the trash. Please fuck off and leave me alone.

Caryma: **I will never see you as disposable.** I just don't get it so I'll shut up

Elisa: But *he* does. The way he blocked me earlier without warning. That way he blocked me again tonight. The way he dismissed my mental health state while threatening to delete our photo. I gave you the benefit of the doubt, but now I think you are as cruel as he is. You telling me that you don't get it is a joke. You are almost as heartless as he is. I never realized that about you before

Caryma: How can I be heartless if my chest has been constricted since last night. I'm failing you if you're thinking about MAID. I'm failing him if you're posting about MAID.

Elisa: Caryma, I'm sorry that you don't understand. Actually, I think a small part of you, whatever humanity is left in you, does grasp this. But you don't want to face the reality. And I am not going to be turned into the garbage that Lee has made me be. To block me and throw me away in the trash like this. How can you do this? I will block your number now. Not because I want to, but because I don't want to have to kill myself tonight.

I unblocked her half an hour later. Shortly after midnight, an [email from Caryma](#) landed in my inbox:

Caryma Sa'd
From: help@sadvocacy.com
To: Elisa Hategan
Sat, Sep 30, 2023 at 12:13 AM
Subject: Try it differently this time

In your shoes, I don't know. I wouldn't have made it. I can't imagine the lifetime of betrayal. It rewires one's thinking. Knowing that, please do not project callousness where my intent is to clarify. I am,

however, deeply sorry for prioritizing clarification in that manner. It is my annoying etch-a-sketch way.

You, Jeremy, and I intersect. Together, we will take our lives back. Your heavy lifting for literal decades got us here. Jeremy is the hook. I am the promoter. The universe conspired to make it happen. And success is just around the corner, I know it with every fibre of my being.

Give me a fair shot at playing my main role. It can only boost you— like the lady at the synagogue who wants you to speak, for example. And we are still less than a month from its release.

Airing things out publicly is messy. The goal right now is to wipe away at smears. That can only be done cutting off the hydra's head. Whatever you might tell yourself, this time you are not alone. A ragtag and sometimes counterproductive group of fellow combatants, maybe, but earnest.

The only interest I have ever had since meeting you was wanting to set the record straight for both our sake's. We unknowingly worked up to the opus, our essential vehicle.

It's all connected, right?

I hope I am getting the prism/diamond metaphor right, but there are infinite timelines with infinite possibilities and iterations of ourselves that are facets of our essential being.

In this timeline, I want us to win. I want you to survive and thrive. It's within grasp, but not guaranteed. After a lifetime of you fighting, it's my turn for the heavy lifting.

I wish we were of the timeline where we had private island and limitless credit cards. I hope those versions of ourselves realize how good they have it. But I also know that in another timeline, we never properly crossed paths and this connection never came to be. So I realize how good I have it.

Our inevitable vindication will be bittersweet because of everything lost along the way that can never be recovered, and everything gained that makes us who we are.

If I'm wrong and vindication doesn't come in our lifetimes, at least we tried.

I will stop rambling. These are my unfiltered thoughts in a turbulent moment.

Caryma

Third Time WASSERMAN Blocks Our Communications

SMS/iMessage Message sent on 9/30/2023 3:28:20 AM

Elisa: "‘Airing things out publicly is messy.’ – What do you call blocking me on a social media site? That's public – it's a public punishment for me, in that I am excluded from your public circle. After everything I've done for you, it's the utmost form of disrespect. If Lee chooses to make this fight thusly public, rest assured that I will respond in kind.

You and Lee are hypocrites in my eyes – you want me to silence & censor how I feel and the struggles

I'm going through – while simultaneously boasting about how you will not be silenced or censored. And you quote our trolls as justification, lol.

I'm not the one who wrecked our working collaboration AND our friendship. Lee did the former, by literally saying in his ever-so-empathetic email that me talking about my “suicide situation” and working with you was “not cool”, because of course he **appointed himself gatekeeper of who you work with**. And you did the latter, by defending him at my expense.

I didn't do anything wrong, but you both punished me anyway. And then he/you blocked me. It hit me like a gut punch. And however dedicated I've been to you, I am not a masochist. Sorry, but I refuse to be limited by Lee's scripts or sensibilities. Or by **your inability to stand up to him and demand respect and boundaries - both for yourself and for those you work with**.

SMS/iMessage Message received on 9/30/2023 7:37:30 AM from Caryma Sa'd (+16133013334)

Caryma: What you are going through is above twitter's pay grade, and harms us both to put it out in raw form. Me especially, because I am the one publicly taking hits to bolster your (unfairly tarnished) credibility. I'm not giving up on that or you, but like I said: give me a fair shot to play my role in promoting our project and getting it past the touchdown line. For yours, mine, and Jeremy's sake. **You already know you're unblocked and re-followed. Not just for the sake of public appearances— that's how I want it to be.**

It's futile to debate your framing me as browbeaten. It's a distortion of my lived reality, but we've exchanged enough words on perception, projection, refraction, subjectivity to know many things can be true and false at once. I'm probably gonna take a few days to visit my mom to recover from the intensity of the past month. This line remains open whenever, if ever you wish to reach me.

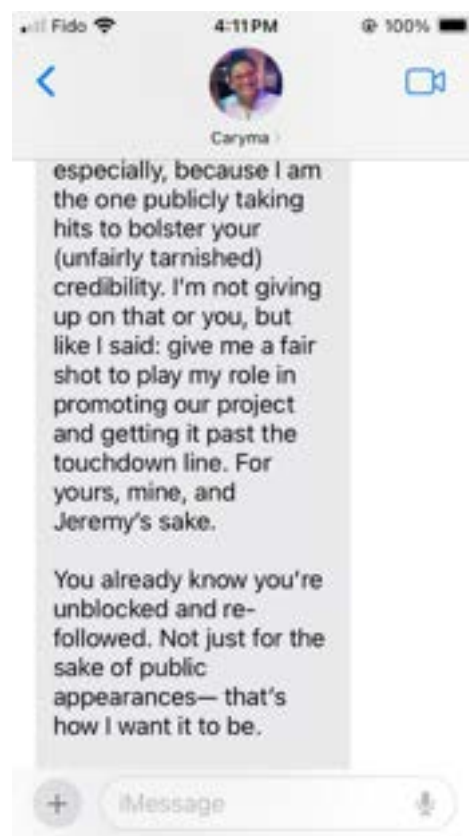
Note: I was finally unblocked again. But it wouldn't last.

SMS/iMessage Message received on 9/30/2023 7:42:05 AM from Caryma Sa'd (+16133013334)

Caryma: *[image of a funny comic]* Palate cleanser, sort of.

SMS/iMessage Message sent on 9/30/2023 8:02:22 AM

Elisa: Caryma, your response still doesn't address any of the points I covered about disrespect and Lee's attitude – if your working partner can be blocked arbitrarily by him as a way to “punish” you for



texting too much, or because he disagrees with my viewpoint, then I am not actually working directly with you. I could say so much about your browbeaten statement but if only you reread what I texted you in the car yesterday – even before I even read his nasty emails – it would lay it all out. So please do reread our entire exchange from yesterday before you reframe what you believe the issues are.

Because I don't think you understand – or are willing to accept – the cause of my angst here. And that is Lee's attitude and demeaning demeanour.

I am concerned that you've already reframed the entire situation in your mind as something altogether different than what actually happened. While I cannot control what you say to yourself to make yourself feel better or to redirect blame away from Lee onto me or other factors, it does not change the impact of his actions. This is about how HE handled this and treated me (and you, but you deny it on your end), and how deeply hurt it made me feel.

And about the fact that you keep clinging to the narrative that my struggles with my "suicide situation" are causing you to take hits on my behalf.

I don't think you realize how many hits I've gotten from those who hate you – but the point isn't to keep score and blame you for going into LGBT events and shoving cameras into idiots' faces, only to be seen as intruders. I could have told you how much negative press that would get you but there was no budging and, in the end, I didn't want to interfere with your decisions.

This is not about what I did – but about how Lee behaved. No amount of reframing or justifying it will change this reality. This is why I continue to be hurt when you respond with a defence of justification instead of understanding the impact that both of your actions (in both behaviour & response) have had on me.

Caryma: I was wrong to say it had anything to do with punishment, that was me feeding bad intel because of my own guilty conscience over not finishing and projecting what my rationale might have been. But I get that it doesn't change the impact on you. So that part I won't argue, and can only **profusely apologize for the hurt caused and experienced.**

Elisa: Whatever you say to justify it, is a deflection of his part in what happened. And now you blame *yourself* for his actions. Anybody but him, right?

But he still blocked me!!!! So if not to punish you - which I do believe was part of it, despite your reframing and denial a day later – then what was it for?! All you do is make excuses for his demeaning and callous behaviour. And apologizing, when *he* does no such thing. And the way he treats you in public only leaves room in the imagination for how he must behave in private. And there is no excuse for that, so I can see why deflecting toward blaming me is so much easier. Because it allows you to reframe a disturbing reality. And it's easier to side with the one you have to live with, rather than the expandable one. I think he's browbeaten you for years. And this is the consequence of that dysfunction.

Caryma: Elisa. Stop. Please.

Elisa: Stop blaming me and not him

Caryma: I'm not and **at no point blaming you.**

Elisa: I didn't do anything wrong and I refuse to take the blame here. So if that's your only comeback, then perhaps you should stop too. Why should I stop? It's what I see – and you won't stop justifying his bs. So you stop it too

Caryma: Okay. We both stop.

Elisa: My line to you is open also – but I need you to see exactly what I experienced, rather than how you have chosen to reframe it

Caryma: Alright, I appreciate the open line. Idk if that means we can still talk unrelated things, or if you prefer a breather. I'll respect your wishes either way.

Elisa: That answer also rests with you. **It starts with your acceptance of the fact that neither you or Lee get to dictate or control whatever I post online. Period. Full stop. Also one more thing**

I NEVER want to hear from Lee – fucking EVER. That asshole will never send me any other message ever again, unless there is an actual emergency and he has to communicate with me urgently. No emails, no texts, nada. I've been hurt and received no apology from either of you re his behaviour, and **this condition is to protect myself from further harm or abuse – which I am convinced is inevitable if he interacts with me. I want him gone out of our correspondence, period. If I speak with you, it's with you only.**

[NOTE: I believe Lee read my text messages and/or Caryma told him not to contact me again, and in a fit of fury he decided that he would block me instead. He then ensured that me and Caryma would never speak again – issuing her the ultimatum he references in his [Gatekeeper Substack](#) blog, and pressuring her to file a false police report against me to have me arrested].

Caryma: **Okay. You'll never hear from him again.**

As far as posting, of course you're free to do as you wish. But my reasonable request is to not provide our ravenous harassers with anything to speculate about. This already hurts too much.

Elisa: I am not removing anything. Much less because of how Lee handled it. I retweeted to spite him. Because of course our harassers wouldn't find something else to discredit me about, lol. And ditto for you

Caryma: Lol what's out there is out there, and I felt the emotion in your words while also dispassionately seeing the counter productive impact. I would never think to ask you to delete that.



Elisa: But Lee did. In fact, he made it a condition to deleting his photo of us. So go ahead and scrub everything lol, as if I care

Caryma: I'm not Kurt. *[On December 11, 2023, Caryma erased her glowing, [5-star review](#) of my memoir Race Traitor from Amazon, proving her own hypocrisy].*

Elisa: But Lee is

Caryma: He isn't either, but there's no use going back and forth on this.

Elisa: And you don't have a problem with it bec you still haven't addressed his demeanour. I hope you also dispassionately see how counterproductive he has been. But again, why waste our breaths here

Caryma: Yes, of course. But that's my conversation to have with him.

Elisa: As long as you have it.

I care about you far too much to risk ever being hurt like that again, by **having our friendship threatened by your bf as a way to control my behaviour**. I hope you hear me on this. I was really deeply hurt. You can't conceive of it because you're not in my head and you don't experience things as intensely as I do.

I cannot feel secure in a friendship where your partner gets to threaten our work together because he is "not happy". This is why I plead with you to reread our convo from yesterday in a couple of days, with a cooler head. And to really ensure I never hear from him again.

I can't take yo-yoing and this kind of insecurity. It goes to all the broken promises and neglect I experienced in my life. I need to know that I can depend on those I actually depend on. If that makes sense. I can't take a shock to my system to have the rug pulled out like this, with no apology but blame of me on his part. I cannot.

Because I am open with you. This one's on me. I chose to open myself fully, and risk the vulnerability that comes with it.

Caryma: Girl. Same.

Elisa: But I can't take this pain. You don't have to say anything, but please understand this. It's not conditional on my part, and it hurts me profoundly to think that it is so on your end. Even though I know this – again – is not of your doing. But its effect reverberates through me regardless. So if you can't commit to unconditional friendship, then please don't do this to me. I've lost so many people I loved that I can't go through this again. Neither you or Lee will ever understand this. And I am too wounded to bother explaining.

And I still think that you reassuring me that for sure, we're bffs, doesn't change the fact that I feel you're saying this because of what you need me to do for you. This will take a long time to heal. I will help you with the article only because I love you, and because I don't want you to keep engaging with me because of it. In other words: I'll somehow find the strength I lack right in this moment and help

you with this piece because I don't want you to play at being friends because you need this from me. I don't need pretence. I just want us to be real. So I'll give you what you need – without making it a condition to get what I need (which is your friendship). I don't want to cheapen or commodify what I thought we had. I don't want fake promises etc. My mind is already telling me that you keep trying to engage just to get the article. And you don't need to lower or debase yourself like this.

So. I'll help you with the article. And then it'll be done. So you don't have to pretend in any way. And after this weekend, we'll let the chips fall where they may.

Caryma: This is an easy fix. I will ask nothing of you, including the article. Not because it wouldn't be brilliant, but so you know there's nothing conditional here. I just want you to continue breathing from one day to the next, and to one day realize you can't remember the last time you had an intrusive thought.

You need to understand you have inherent value, far beyond your talents as a writer and thinker.

You matter because you are you. There's no pretence.

Elisa: My value has always been measured by what I have to offer people. I don't even know of a different way. But if you would like, I will still contribute. If any words or ideas emerge in my mind, I'll dump them into the shared doc and you do with them as you wish. But it's not likely to happen much earlier than this evening. Especially with having to shift gears emotionally. But there are some things I'd like to articulate. So we're stuck with one another for this project, for better or worse :)

In my poetry book, there is a series of poems I wrote between ages 24-27. I strung them together into an interconnected series. It starts on page 18 and goes to page 33, ramping up in intensity. These poems were written BEFORE I even found thousands of Jewish relatives on DNA sites and discovered how many unknown relatives I had lost. It was well before I found out about Celan's family and before other cousins on ancestry DNA database told me of others in our family trees who perished. If you have a chance, pls take a look at those poems in my Remnants of Sunlight series. I think it's pretty much self-explanatory. I wrote the first in the series soon after I visited Auschwitz.

Caryma: I'll be at the office in a bit

Elisa: No rush. I think it would help give you context for why I am so upset. And also, to explain why I want to contribute to this article. The energy and resonance of the poems on pages 18-33 basically explain it for me. And also gives you an idea of "the old country" where we came from – me and Yaroslav both. AND the poem on page 49-51. It talks directly about what they did - the Poles, but also what all of them did. It's about the programs and massacres. It's also a search for (futile) answers

Caryma (11:52 AM): The bleakest part is how fleeting it all is. Beautiful words though, as always.

Elisa: Draw power and strength from the fact that it's all fleeting. That in the end, what others say or think about us means nothing because it'll all vanish someday. All that matters is what we do in this moment, how we comport ourselves and how authentic we are to the truth.

I always thought that my legacy would be preserving truth. But then I was dragged to this shithole and realized that it's no different than the old country – that winners erase truth and victors rewrite history. Hence the daily futility and hopelessness I feel. It's like trying to preserve a beautiful sand castle on the beach, while relentless waves crash against the shoreline, threatening to destroy it. And while I know the destruction is inevitable, a part of me refuses to stop fighting against the erosion. But a single drop cannot beat back an ocean. We have to become the ocean.

NOTE: After this conversation, we were back – and it was time to get back to work. I sat myself out in the back garden, balancing laptop on my knees, and went at it. Through early afternoon, Caryma and I exchanged texts about Hunka and the story.

SMS/iMessage Message received on 9/30/2023 2:07:23 PM from Caryma Sa'd (+16133013334)

Caryma: FYI

Family unaware Hunka would be honoured in Parliament, friend says | CBC News

A longtime friend says the Hunka family was unaware 98-year-old Yaroslav Hunka would be honoured in Parliament last week in front of Ukraine's president, setting off an international controversy.

<https://www.cbc.ca/news/politics/friend-hunka-family-north-bay-parliament-political-controversy-1.6983517>

Elisa: Figures the CBC would write the sympathetic, apologetic commentary on the poor family. I skimmed it really fast, hoping and praying that the article wouldn't mention those old articles about him. And thankfully it did not.

So it's obvious that Martin contacted the office and they wanted to send dad to meet Zelenskyy and feel special in Ottawa, but it makes a lot more sense now that they didn't know he would have the spotlight shined on him. It's like you were asking, why would they do this? They only put in the request because they wanted to be in the audience and be part of the show, and wined & dined alongside highfaluting govt officials. Martin probably thought he'd meet some influential people. They never expected the geezer to be spotlighted, but that probably came from some Ashley or Kandi in the speakers office who said, "You know what would be a great idea? If we could show that we ourselves have Ukrainian war veterans. Let's go down that list of guests and find a hero we can showcase!"

What a farce.

For my part, I'm going to stay away from reading articles today, at least not until I churn out a few hundred words. I still haven't gotten to that point yet, but soon. if I read too much now, I might end up demoralized and I don't want to set myself up for thinking that the story's been done, bec in reality nobody has written the story I have in my head right now. As soon as I get some of it on paper, I'm going to read everything in more depth.

SMS/iMessage sent on 9/30/2023 2:18:40 PM

Elisa: But I know you have to do the summary of what's going on, and so I'm glad you're gathering the details.

When they sent in the request, there had to be some minor vetting because obviously people read those articles about him being a war veteran. Or that was put into his application

That's the only part I'm unsure of. If either Martin added his media profiles into the request, or whether that was done by the speakers office people who are in charge of vetting the guests.

Either way, vetting consisted of googling him and finding the articles about him. Because, and we'll have to re-check the wording, but I believe they introduced him with very similar words as those used in the 2022 articles that featured him.

If you can find the actual introduction, like exactly what was said when they introduced him, that will be very useful. Apologies if it's already in the Google document

SMS/iMessage received on 9/30/2023 3:01:15 PM from Caryma Sa'd (+16133013334)

Caryma: I'll get the exact words

SMS/iMessage sent on 9/30/2023 3:04:37 PM

Elisa: I'm now working on the war of narratives that happens when wars start. Which I'll tie into those 2022 articles. It's slow going but at least I've gotten going lol.

There's too much to do for me to lose today, so I plan to do about 2000 words if I can today. I think the piece will run longer but not by much, and I'd rather overwrite and we pare it down, than to stay in my state of mental paralysis.

When I get stuck, I plan to just work on a different section. I suggest you do the same. Instead of getting stuck for too long, if you stumble onto some thing that's taking longer than you expected, just make a note about what you'll say when you come back to it, and move onto a different point

SMS/iMessage sent on 9/30/2023 4:31:16 PM

Elisa: Tbh it'll probably be closer to 3000 words but I'm not worried. I've done a little over 500 words so far and it's only 4 pm so I'm hopeful I'll hit my target. Taking a short break now. I pasted the "finished" bits into our doc.

I want to work on more exciting things, and yet this had to be done. I'll probably start on a different section and come back to this to finish it. But it's all good

SMS/iMessage sent on 9/30/2023 4:43:13 PM

Elisa: You will also see that I created a skeleton of a chronology to how I envision the story flowing. Feel free to add your input or suggest a different flow. I just think this is intuitive

SMS/iMessage sent on 9/30/2023 4:57:59 PM

Elisa: Feel free to add into any section you want. Any snippets of ideas or sentences you have. I'm counting on you to complete the specific sections that I tagged you in, but you obviously can add to any other section.

SMS/iMessage Message sent on 9/30/2023 6:50:50 PM

Elisa: 12 photos in total.

SMS/iMessage Message sent on 9/30/2023 8:30:59 PM

Elisa: FYI the article will NOT be finished by the end of the weekend if I don't get help with it. I hope you can put aside some time tonight & tomorrow to work on it

Elisa (10:00:05 PM): Do you think you'll be able to give me anything tonight??

I'm going back to it soon, just thought I'd ask

Elisa (iMessage 10:54 PM): Why am I blocked again?? What is going on????

At this point, all my iMessages after this point turned from blue to green – and the green ones weren't delivering. I had been blocked on her phone too. I rushed to message her on Facebook Messenger. In the span of seconds, I watched in real time as one after another, her accounts became unavailable. Blocked on Facebook. Blocked on Instagram. Blocked on every social platform.

I knew it was Lee. He was pissed off because Caryma and I were texting about the article. He hated me for not complying with his irrational demands that I delete my tweets, and for telling Caryma that I didn't want to hear from him again because he was both abusive and cruel. And he must have read Caryma's text messages the same way he monitored everything she did, spied on everything I wrote her, and hacked our correspondence throughout our friendship.

I flashed back to what **Caryma told me back in June – that she feared and was trying to avoid Lee issuing her an "ultimatum"** – and I knew that day had come to pass. Everything I witnessed over a span of two years convinced me that he controlled both her life and law practice, that he had her convinced that she was useless and would never manage without him – so she did whatever he demanded, or was met with uncontrollable rage.

Can she see any of my messages? Is he deleting everything? Is she all right? I wondered. Only a week earlier she had invoked our intense connection, our synergy and how our thoughts melded. Just hours earlier she pleaded with me to "please don't quit what we have". And suddenly, without warning, she was gone.

The ONLY message I received afterwards was the October 2, 2023 email, which didn't sound like her, nor resolve any loose strings or settle the money she owes me. There were no voicemails, and absolutely no indications that the email I received wasn't actually written by Lee. None of the money she owed me was paid out – nor did she reimburse my travel expenses to North Bay, as she had promised in the [Sept 25, 2023 text message where she invited me to come along](#). There were no cautions, no warnings, nothing at all. And then I was arrested and charged with “criminal harassment” – and for the next two years, Caryma lied to police numerous times, doing everything in her power to terrorize me with police involvement and have me repeatedly arrested, in what I am convinced became a persistent effort on her and Lee's part to [drive me to suicide](#).

In July 2025, [SA'D posted a photo of herself smirking on Leaside Bridge](#), with the taunting caption: *“Please keep bicycles and pedestrians off the highway.”*

The Aftermath: WASSERMAN Admits He Blocked Me

A week later, on October 7, 2023, [Lee WASSERMAN published his Substack article confirming that it was him who blocked me](#). He chose “Gatekeeper” as his anonymous handle – a direct reference to the fact that I called him a “Gatekeeper” in my June 2023 letter to Caryma. Nobody other than SA'D and WASSERMAN had knowledge about the specific details referenced on Substack (such as gifts I gave her, or the ADHD pills she took from me, or that we experimented with mushrooms), confirming beyond a shadow of doubt that WASSERMAN was the author.

Unable to hide his jealousy at the closeness between Caryma and me, WASSERMAN admits he felt insecure and “hollow” over how much time Caryma spent texting with me, writing: ***“In 2023, She began to slowly withdraw into her text messages and DMs with Former Nazi. A distance grew between us. For the first time in our relationship, I felt left out. It made me hollow inside.”***

After he hacked the email account Caryma had reassured me was private and read my confidential letter, Lee wrote: ***“I wanted their relationship to end at this point, but She insisted it could be salvaged. She begged me to give Former Nazi another chance, saying I misunderstood her intention behind the letter. She promised to dial back the relationship. At the same time, they***

continued exchanging platonic I love yous. I wasn't happy."

According to [Lee's description of the events](#) that took place on the night of September 30, 2023, after I started "overstepping" him by not being credited for Hategate, and after I posted on X/Twitter that I wanted to apply for MAID, **he gave Caryma an ultimatum – him or me. She fought him until "the eleventh hour"**, before acquiescing and allowing his jealousy to terminate our friendship, without any notice or explanation to me, in order to preserve her relationship with him:

A couple of days after returning home [from North Bay], I found out Former Nazi was publicly tweeting about committing suicide. It only came to my attention because one of our mutual stalkers was mocking the entire situation. I realized that not only was She mentioned in the post, but it was published mere hours after She shared a picture of them smiling together. And all this in the middle of trying to promote a project that was gaining steam. [Hategate – a project I wrote in majority].

It is not a crime to want to apply for MAID. Nor is it a crime to speak openly about it. But once you involve other people, it becomes their business. And my gut instinct was to protect Her and her brand, because none of this sat right. It may have been a cry for help, but we were not in a position to provide the necessary support. Some people cannot be reached because of the conditions they have.

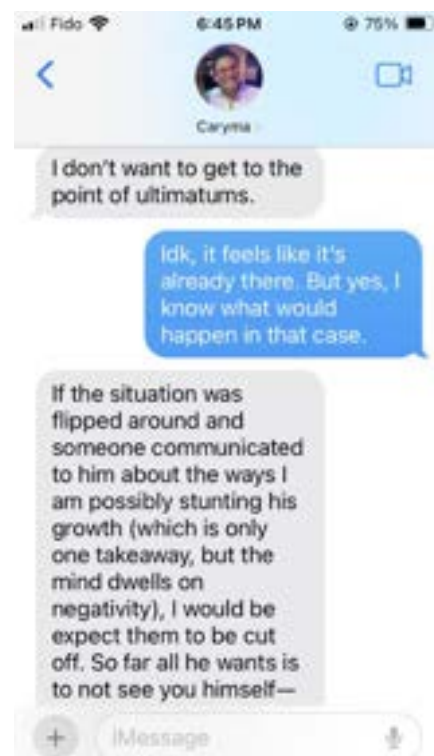
I blocked Former Nazi. There were objections and She unblocked. It took an ultimatum for Her to see the seriousness of my concerns. I have never issued an ultimatum before. She knows I will follow her anywhere. Freedom rallies. Below freezing temperatures, day after day and night after night at the convoy. The restricted area behind a police station. The centre of a hostile crowd. To the end of the earth. But it was a choice between me and Former Nazi, and Her choice to make alone. At the eleventh hour, she decided to cut ties with Former Nazi."

WASSERMAN's words offer a glimpse of the coercion and psychological duress SA'D experienced that night, and suggest the choice wasn't made of her own volition. Given her complete dependency on WASSERMAN to run her law practice – he'd appointed himself as manager, office administrator, bodyguard, talent agent, business and personal partner, to the point that she ran almost every decision by him first – I believe she thought she had little choice but to give in to his latest ultimatum.

WASSERMAN'S claim that he had "never issued an ultimatum before" was a boldfaced lie. The transcript of our June 2023 text-messages (sent after Lee blocked me the first time, against both of our wishes, after having hacked into a private email to read the letter I'd marked confidential and for Caryma's eyes only) shows that SA'D voiced concerns over WASSERMAN issuing "an ultimatum". Her fear, back in June, betrayed a history of ultimatums decreed by a man whose rage and temper tantrums I have witnessed firsthand.

At first, I didn't know if this block was going to be temporary. Back in June, SA'D and I still found ways to connect behind his back, and nothing suggested this time was different. I believed that WASSERMAN intercepted and possibly deleted everything I sent – because he publicly admitted to doing so with SA'D's ex-boyfriend. In [his Gatekeeper article](#), Lee describes a situation where he took over communications with SA'D's ex-boyfriend, which led me to believe he'd taken the same approach and screened out my messages:

"When we first got together, her ex-boyfriend was preying on her kindness to try and take her cat, a laptop, and anything else he could squeeze. She would constantly get upsetting phone calls and text messages. One day, she handed me her phone, looking dejected but hopeful: "Can you get him to stop?" I took it as an honour, considering she usually advocates for others. I was polite but firm. He never called back again."



On SP411, the website Toronto [Life Magazine](#) described as “The TripAdvisor of [sex work](#)”, which WASSERMAN is owner and CEO of (there is indisputable, visual confirmation of this, along with solid evidence), WASSERMAN – under his handle “Chase”, one of at least two handles he operates on SP411 –threatened, blocked, and extorted several women, bragging that he could “strike at anytime and you wouldn’t know what hit you 😊”. In one female sex worker’s case, he blocked and unblocked her again specifically BECAUSE she was suicidal. He thought it was funny, even as others were extremely concerned that he would cause her to kill herself.



I believe that WASSERMAN worked together with SA'D to orchestrate a situation where false police reports would be filed in order to have me arrested, because they know that my phobia of police is my Achilles Heel. In several conversations (verbal and by text-message) I made it clear that if I was ever arrested for anything, such as breaching the civil gag order, I would kill myself.

Statements made by SA'D – which appear in her false police reports and the October 14, 2023 AXON video interview with 14 Division cops – align so closely to the wording in WASSERMAN’s Oct 7, 2023 Substack article (some phrases are repeated verbatim), that I have no doubt he coached her to lie to police numerous times between 2023 and 2025 in a joint effort to stop me from disclosing how I was defrauded, and going public with information that would get her disbarred and likely arrested.



TAB 4

STALKING VIDEOS / PHOTOS TEXT-MESSAGED TO ME BY CARYMA SA'D – TAKEN BY HER BOYFRIEND ADAM LEE WASSERMAN

<https://drive.google.com/file/d/1U40W4rSYDn-l8Fuy3duhHqh2Wli-yNLh/view?usp=sharing>

https://drive.google.com/file/d/1k17_20-2tWGJ1sqz19kjHD8sES-mdaDf/view?usp=sharing

<https://drive.google.com/file/d/1jbhZQYY6aPooX4f0-J3zisOKnaNJUG3y/view?usp=sharing>

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https://drive.google.com/file/d/1pTCzfdK_FTvcB3b6HTnc86kd2bC0BJot/view?usp=drive_link

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STALKING JENNIFER EVANS OUTSIDE HER CONDO – 2023-05-05

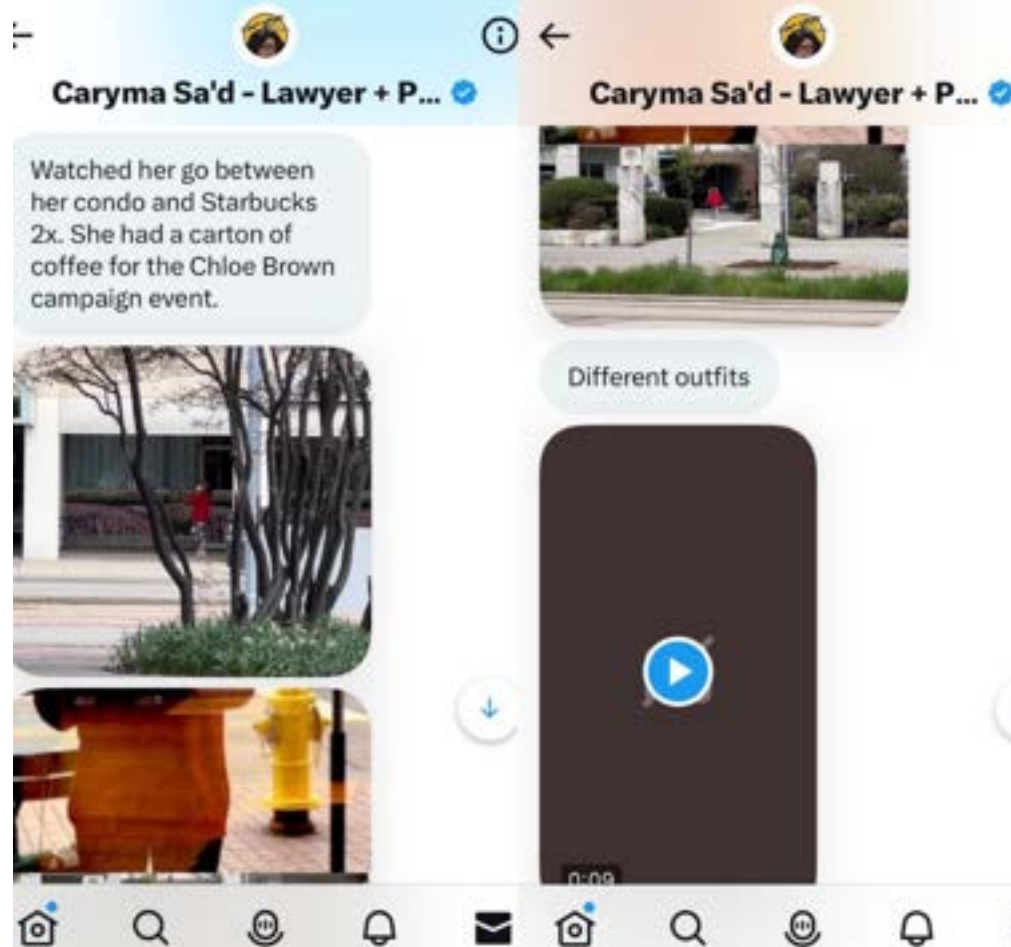
Throughout spring 2023, SA'D sent me photos/videos taken by WASSERMAN while stalking Evans. I gave this material evidence to their stalking victim BEFORE MY ARREST. Evans decided to go public, and posted this screenshot and other evidence online. I did NOT instruct Evans to publish it. I am only a witness. What Evans does with the evidence is up to her. It is NOT illegal for a victim to speak out about being stalked.

In revenge, SA'D reported me to police for breaching my release conditions not to contact her directly or indirectly, telling cops I released "private information" – even though there were no conditions preventing me from communicating ABOUT SA'D to their stalking victim(s).

I had NOT been arrested or charged at the time when I gave Evans these materials and agreed to be her witness in a civil proceeding.

Furthermore, this evidence of SA'D's boyfriend stalking a woman is not "private information" but bona fide proof of stalking and harassment.

In 2023, there were NO conditions preventing me from speaking about my case online. That condition was added after my second (June 2024) wrongful arrest – which was prompted by SA'D's multiple false police reports and frequent/persistent false communications to police.



TRESSPASSING ON A SUSPECTED CRITIC'S PROPERTY AT 4 AM – Dec 30, 2022

In December 2022, someone posted an unflattering cartoon of SA'D on Twitter. SA'D enlisted my help in trying to identify the owner of the anonymous account that posted the drawing. We wrongly believed we had identified the person – a woman named Brenda Comacchio (it turned out the cartoonist was a different Brenda, who lives in Ottawa). At 4 AM on December 30, SA'D and her boyfriend WASSERMAN took an Uber to that property, where they filmed and photographed the house and trespassed onto the property to get a closeup photo of the vehicle in the driveway. This would be viewed as "conduct unbecoming of a lawyer". Stalking critics could lead to disbarment – which is why SA'D filed many false police reports: to stop me from disclosing evidence of illicit/criminal activity committed by her and/or her boyfriend.



TAB 5

	File Name	Thread	Tweet	Notes	Themes	Link
1.	23-12-10 2245 Lawyer Next Door	1	<p>THE LAWYER NEXT DOOR 🍷</p> <p>The first time I saw Caryma, standing in the sunlit doorway of that Court of Appeal courtroom, I saw hope – the hope of vindication & friendship.</p> <p>A year later, I found myself used & discarded by a lawyer who profited from my work & weaponized police to keep me quiet.</p>	<p>HATEGAN posted and pinned this thread immediately after being released from the police station following her arrest for criminal harassment.</p> <p>Attached is a photo of HATEGAN and me with a “rip” photoshopped between us.</p> <p>This remained her pinned tweet, garnering 116,000 views.</p>		Link
2.	23-12-10 2247 Lawyer Next Door	2	<p>Caryma and I became Twitter friends shortly after her public scandal involving Chris Sky in July 2021. She reached out to me, wanting dirt on her enemies at CAHN, people I was suing in civil court. For my part, I hoped to get legal advice on appealing a civil court loss. She assured me our conversations were privileged. In September 2022 we finally met in person, when she came to a hearing to give me moral support. /2</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN initially reached out to DEAN BLUNDELL, asking him to put us in touch.</p> <p>HATEGAN asked me to listen to her story in my capacity as a lawyer so she would not be limited by the Superior Court injunction. HATEGAN spewed her entire history with ELIZABETH MOORE, whose name was not familiar to me at that point. I did not provide any advice on appealing her civil loss.</p>	<p>Shares private information</p> <p>Retribution against Elizabeth Moore</p> <p>Projects desire for vengeance</p>	Link
3.	23-12-10 2249 Lawyer Next Door	3	<p>From the moment we met IRL, we instantly connected. Soon we were texting or talking daily, often for hours. I offered to mentor her as a journalist bec she wasn’t calling herself one back then. I also offered to write articles. Within months, I'd ghostwritten several pieces & we collaborated on several more. /3</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN makes it clear that she voluntarily offered her assistance with writing and editing.</p>	<p>Shares private information</p> <p>Exaggerates her influence</p>	Link

4.	23-12-10 2251 Lawyer Next Door	4	<p>I was never paid; at first by choice, when I refused an offer of \$100. For me, the friendship was about the emotional support. Due to the gag order that followed my civil court loss, I was forbidden to speak about my situation with anyone, not even a shrink. The only loophole was lawyers – and Caryma became my only friend, the only person I could talk about my stress.</p> <p>I've been diagnosed with depression for two decades now, and Caryma became a lifeline. /4</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.</p>	<p>Shares private information</p> <p>Retribution against Elizabeth Moore</p> <p>Toxic dependency</p>	Link
5.	23-12-10 2252 Lawyer Next Door	5	<p>She watched a video I made in 2020 titled “The Truth About White Lies”, which contained much of the evidence for my civil suit, and grew convinced I was innocent.</p> <p>Thereafter, she started dangling the carrot of my redemption – promising she would vindicate me by making a podcast that would present evidence to exonerate my reputation. She promised my story would be told. I had no reason to doubt her. /5</p>	<p>HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction.</p>	<p>Retribution against Elizabeth Moore</p>	Link
6.	23-12-10 2253 a Lawyer Next Door	6	<p>For the past year, I did anything she wanted me to do – research, writing, giving her advice, reviewing legal docs before she sued people, accompanying her to Ottawa to document the June 9 demo, everything.</p> <p>I started to sleep with my cell phone next to my pillow, in case she needed input at any point in time. She called me her “consigliere”. /6</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.</p>	<p>Shares private information</p> <p>Toxic dependency</p> <p>Exaggerates her influence</p>	Link
7.	23-12-10 2253 b Lawyer Next Door	7	<p>I advised her against several troubling acts she & her boyfriend Lee planned to engage in, which in my view would impact her professionally and potentially lead to criminal charges. I started to panic nearly every time she brought up an idea. A couple of times I begged her to refrain from doing things that imo seemed astonishingly stupid, such as /7</p>	<p>HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.</p>	<p>Toxic dependency</p> <p>Exaggerates her influence</p> <p>Projects desire for vengeance</p>	Link

8.	23-12-10 2255 Lawyer Next Door	8	<div>- Her and Lee creating a disruption at a public restaurant on NYE to ruin her enemies' celebration</div> <div>- Strategizing a letter-writing campaign to target an enemy's workplace</div> <div>- Filming at 4 AM the property of someone suspected of posting an unflattering cartoon of her on Twitter /8</div>	<div>Attached screenshots include our private DMs.</div> <div>HATEGAN falsely claims to have advised against engaging in troubling acts, suggesting that the ideas were serious, when they were not.</div>	<div>Shares private information</div> <div>Projects desire for vengeance</div> <div>False claim – miscellaneous</div>	Link
9.	23-12-10 2256 Lawyer Next Door	9	<div>Lee repeatedly stalking a woman Caryma is currently engaged in litigation with, by filming and laying in wait outside her condo, hoping to snap photos of her.</div> <div>I advised them not to post the photos & film on Twitter, reminding them that she had already complained of being stalked. /9</div>	<div>Attached screenshots include our private DMs.</div> <div>HATEGAN misrepresents serving documents as “stalking.”</div> <div>HATEGAN exaggerates her influence.</div>	<div>Shares private information</div> <div>Projects desire for vengeance</div> <div>Exaggerates her influence</div> <div>Expresses contempt for my partner</div>	Link
10.	23-12-10 2257 Lawyer Next Door	10	<div>Fast-forward a year later: on September 11-2, 2023 we published an 85-pg article titled “The #HateGate Affair”, which I wrote in majority, but this time I was credited as co-author. Donations rolled in but I never saw a cent, even though we were supposed to share them. /10</div>	<div>HATEGAN falsely implies she is owed money.</div> <div>Less than \$1,000 was collected in donations specific to the HateGate Affair, which was spent on illustrations, advertising, website hosting, and a celebratory dinner.</div>	<div>Claims ownership of HateGate</div> <div>Claims money is owed</div>	Link
11.	23-12-10 2300 a Lawyer Next Door	11	<div>I also started helping her to set up a not-for-profit organization, so we could do interfaith peacebuilding. I wanted to steer her away from the vitriol, the relentless Twitter battles, the chasing conflict for clicks. I was worried about her wellbeing and Lee's persistent need for revenge /11</div>	<div>Attached screenshots include our private DMs.</div> <div>HATEGAN exaggerates her influence.</div> <div>Contrary to HATEGAN's portrayal, engagement in “Twitter battles” and conflict was not a primary focus. Most of my effort went into documenting protests, with such coverage routinely making the news. HATEGAN tried unsuccessfully to discourage me from attending rallies.</div>	<div>Shares private information</div> <div>Projects desire for vengeance</div> <div>Exaggerates her influence</div>	Link

12.	23-12-10 2300 b Lawyer Next Door	12	<p>Revenge was always on the menu. For Caryma it was only the "garnish", but for Lee, it always served as the main course.</p> <p>Revenge didn't extend to just framing & editing protest footage to fit a narrative. It also involved strategic lawsuits that imo weaponized law & safety fears against her critics /12</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN mischaracterizes defending myself through legal recourse as “revenge.”</p>	<p>Shares private information</p> <p>Projects desire for vengeance</p> <p>Expresses contempt for my partner</p>	Link
13.	23-12-10 2302 Lawyer Next Door	13	<p>Although we published #Hategate just days earlier, Caryma was already thinking of greener pastures. She felt we had outgrown Crier Media, and she mused about hitting up Maxime Bernier for cash. /13</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN misrepresents the content of my private messages.</p> <p>It is significant that she cherry-picked messages about MAXIME BERNIER as this plays into a narrative circulated by my detractors that I am “far-right.”</p>	<p>Shares private information</p>	Link
14.	23-12-10 2304 a Lawyer Next Door	14	<p>Two weeks later, we were in North Bay, trying to track down Martin Hunka (the Nazi who got a standing ovation in Parliament). After being given \$1500 by a fan who liked #Hategate (whose name I'll omit), Caryma solicited me to come, promising me approx. \$250 for an article. /14</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN falsely implies she is owed money.</p> <p>No article was published about the trip to North Bay.</p>	<p>Shares private information</p> <p>Claims money is owed</p>	Link
15.	23-12-10 2304 b Lawyer Next Door	15	<p>In response to videos of us in North Bay that she posted on Twitter, we experienced an explosion of negative criticism & online harassment. Already struggling with chronic depression & depleted by physical exhaustion following sleep deprivation during the writing of Hategate (plus 2 more articles I wrote the following week), I crashed. /15</p>			Link
16.	23-12-10 2305 Lawyer Next Door	16	<p>The criticism was brutal, calling me a Nazi and suicide-baiting me, at a time when I was struggling to reconcile the fact that Martin Hunka’s squadron operated in the same Romania-Ukraine border where several of my genetic relatives were murdered during WW2 /16</p>	<p>The account she highlights as suicide-baiting her is operated by JOHN THIBEAU, who she now passes information to for the purpose of harassing me and my family.</p>		Link

17.	23-12-10 2306 Lawyer Next Door	17	<p>My suicidal ideation returned with a vengeance. I tweeted that I wanted to apply for MAID once people w/ mental illness become eligible in March 2024.</p> <p>That’s when Caryma’s bf Lee decided my mental distress was bad for Caryma’s Twitter “brand” and he blocked me from her social media accounts and emails. It started with Twitter /17</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN engages in coercive control with reference to suicide.</p>	<p>Shares private information</p> <p>Coercive control</p> <p>Expresses contempt for my partner</p>	Link
18.	23-12-10 2308 Lawyer Next Door	18	<p>Caryma insisted it was a mistake. As she'd done before, she tried to run interference and pacify her revengeful boyfriend. That night, she sent me a letter imploring me to keep working with her. "We would take bullets for each other", she told me hours before Lee blocked me permanently /18</p>	<p>Attached screenshots include our private DMs.</p> <p>The statement “We would take bullets for each other” was about my partner, not HATEGAN.</p>	<p>Shares private information</p> <p>Projects desire for vengeance</p> <p>Expresses contempt for my partner</p>	Link
19.	23-12-10 2309 a Lawyer Next Door	19	<p>On Oct 2 I received a single email from Caryma, where she acknowledged my authorship of HateGate but said she no longer wanted to collaborate with me on future projects. She wrote, “I am no longer comfortable sharing my network or connections. You are equally free to accept media requests without my participation.” /19</p>			Link
20.	23-12-10 2309 b Lawyer Next Door	20	<p>I NEVER HEARD FROM HER AGAIN. She did not tell me to stop contacting her. She never sent me a single message saying, “Don’t message me”, "Stop it.” Nothing at all. I didn’t know what was going on, if Lee was deleting my messages. I was in shock & suicidal. Caryma brought police to my door via 2 wellness checks /20</p>	<p>HATEGAN engages in coercive control with reference to suicide.</p>	<p>Expresses contempt for my partner</p> <p>Coercive control</p>	Link
21.	23-12-10 2310 Lawyer Next Door	21	<p>On Oct 7, Lee published a Substack article where he breached solicitor-client privilege. In it, he misrepresents events & admits HE was the one who blocked me from communicating with Caryma. He wrote about feeling threatened by our friendship and said he blocked me because me being suicidal was bad for Caryma’s “brand”. /21</p>	<p>It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.</p>	<p>Expresses contempt for my partner</p>	Link

22.	23-12-10 2311 Lawyer Next Door	22	Not only did Caryma’s boyfriend publish, on a public blog, privileged communications between Caryma and me, he also lied about throwing away prescription drugs related to Caryma's “undiagnosed ADHD”. We texted about the drugs on 3 separate occasions. I wrote them to request taking down the Substack article. They didn't acknowledge me at all. /22	Attached screenshots include our private DMs. It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.	Shares private information Expresses contempt for my partner	Link
23.	23-12-10 2314 Lawyer Next Door	23	My mental health spiralled downhill. I had a breakdown. Caryma had been my lifeline for 1.5 years. We spoke or texted everyday, for hours. Our regular, daily exchanges for over a year involved dozens of messages per day. We told each other we loved each other. We were platonic. /23	HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.	Toxic dependency Coercive control	Link
24.	23-12-10 2315 Lawyer Next Door	24	I felt exploited & abandoned during a crisis that happened on a job. She had solicited me to go to North Bay to write the article – she said I’d get paid approx \$250. She had a duty of care, which she relinquished. She also didn't respond when I asked what was happening to the #Hategate donations. /24	HATEGAN falsely implies she is owed money.	Claims money is owed Coercive control	Link
25.	23-12-10 2319 Lawyer Next Door	25	To this day, I don’t know if she saw my messages – because by her boyfriend’s own admission, he is the one who blocked me from her accounts. Last week, I was informed that police were going to charge me with criminal harassment. I was in shock because I’d NEVER received any cautions or warnings. /25	It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.	Expresses contempt for my partner Charges	Link
26.	23-12-10 2320 Lawyer Next Door	26	On Dec 2, the anniversary of my mother’s death, in full throes of a self-harm episode, I had to deal with police. If it wasn’t for the compassionate, quick-thinking actions of a couple of activists, strangers on the other side of the political divide, one of whom reached out to police to plead for me to have a few more days before my arrest, I would not be here today. /26	HATEGAN engages in coercive control with reference to suicide. HATEGAN is copying/repeating part of her origin story, i.e. that she called a member of Anti Racist Action after an alleged suicide attempt while still with the Heritage Font.	Coercive control Collaborates with my harassers Charges	Link

27.	23-12-10 2321 Lawyer Next Door	27	<p>For the police to say that Caryma had told me not to contact her "multiple" times, is a lie. I welcome any forensic examination of my phone or email records. Not ONE such message was ever sent to me. It is clear to me that a false police report was filed against me, which is a tort in criminal law.</p> <p>I believe this false report was filed to shut me up, since I posted on Twitter – and also said in my emails – that I planned to write an article as a rebuttal to the Substack blog. /27</p>	HATEGAN falsely accuses me of filing a false police report.	<p>Claims false police report</p> <p>Charges</p> <p>Projects desire for vengeance</p>	Link
28.	23-12-10 2328 Lawyer Next Door	28	<p>I believe they’re afraid that I will disclose the circumstances surrounding how she came in possession of my prescription Ritalin. Or that I'll talk about some of the other shady activity, such as the stalking and harassment of Caryma’s “enemies”. Or that I will disclose details about Lee’s past involvement in the prostitution business. He saw that I was engaged in convos with an escort who alleges that she knew him when he was operational. He also knows I've done my research on bulletin boards he used to operate /28</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	<p>Shares private information</p> <p>Projects desire for vengeance</p> <p>Conspiracy</p> <p>False claim – miscellaneous</p>	Link
29.	23-12-10 2331 Lawyer Next Door	29	<p>From what I’ve witnessed during our friendship, Caryma’s boyfriend Lee seems to control her law practice. He has access to her social media, her email, everything. I believe he read everything I sent her, to the point I was concerned that he had access to privileged convos where I discussed my abuse, my legal case, etc.</p> <p>He became angry with me because I had sent her a private letter in June, after becoming concerned about how he was treating her and his decision-making process – it seemed to me like he was dictating her decisions, breaching privileged correspondence, etc. /29</p>	<p>It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred. Nor does my partner control my law practice.</p> <p>HATEGAN is referring to a 14-page letter that was, in fact, a jealous hit piece against my partner</p>	<p>Expresses contempt for my partner</p>	Link

30.	23-12-10 2339 Lawyer Next Door	30	<p>Today, I finally went downtown to 14 Division and I was charged with "Harassment by Repeated Communication with Person."</p> <p>The name I was charged under was "Elisse Hategan" - the same name used by an anonymous account calling itself SeriousMother that has threatened me with violence, and which I believe is operated by Lee, or is under his direction.</p> <p>Nobody has called me Elisse since I was 19; my legal name change happened almost two decades ago. Caryma has FULL KNOWLEDGE OF MY LEGAL NAME – she has read my legal documents, plus has my not-for-profit incorporated paperwork. She’s worked with me for the last year.</p> <p>I am convinced they used “Elisse” because Lee is trying to humiliate & degrade me by bringing me back to that moment where I was a teenage neo-Nazi named Elisse. The time before I discovered my father's Jewish roots and converted to Judaism. /30</p>	<p>HATEGAN falsely accuses my partner of running @seriousmother.</p> <p>I never referred to HATEGAN as “Elisse” in any of my communications with police and did not ask for her to be charged under that name.</p>	<p>Conspiracy</p> <p>Projects desire for vengeance</p> <p>Expresses contempt for my partner</p> <p>SeriousMother</p> <p>Charges</p>	Link
31.	23-12-11 0046 Lawyer Next Door	31	<p>And now, I NEED YOUR HELP. If you can spare a few dollars, please send an e-transfer to elisa@elisahategan.com</p> <p>If you can connect me with an affordable lawyer, please do.</p> <p>I don't have any family or friends. No support or income. You don't know me, but I am asking for your help.</p>		<p>Solicits donations</p>	Link
32.	23-12-11 1354 Lawyer Next Door	32	<p>Today Caryma deleted her Amazon book review. Because being deleted by her boyfriend from her phone, email & all social media accounts without warning or explanation, wasn't enough.</p> <p>I had to go from "Hero" to "Former Nazi" - because being exploited & discarded wasn't enough.</p>	<p>HATEGAN makes it clear that she stalks my online activity.</p>	<p>Stalking</p> <p>Expresses contempt for my partner</p>	Link

33.	23-12-11 1820 Lawyer Next Door	33	<p>Before you ask - WE'RE GOING TO TRIAL.</p> <p>No peace bonds, no bargaining. Full vindication and nothing but. Cross-examination and disclosure. And then, a full investigation into the false police report that was filed, and legal consequences for those responsible.</p> <p>Pls contribute to my legal fund with an e-transfer: elisa@elisahategan.com</p>	HATEGAN falsely accuses me of filing a false police report.	<p>Claims false police report</p> <p>Solicits donations</p> <p>Charges</p>	Link
34.	23-12-12 1257 Lawyer Next Door	34	<p>When it comes to strategic legal actions, a criminal trial is a whole other world from premeditating strategic lawsuits for optics in small claims or other courts.</p>	Attached screenshots include our private DMs.	<p>Shares private information</p> <p>Charges</p>	Link

35.	23-12-12 2327 Lawyer Next Door	35	<p>The unpacking of the #Hategate FOIP papers took me 2 days. There were 21 or 22 packages, approx 50-60 pgs each from what I recall. I read every page, 19 out of 21 pkgs, and compiled notes into a 110pg doc. That was intense labour.</p> <p>THEN there was research that went w/ writing Hategate itself. Parts of it triggered my PTSD and I was bawling through many parts. Cue further insomnia.</p> <p>It was agony, but I still met our self-imposed deadline. I slept maybe 2-3 hrs at best across almost 10 days to pull this off.</p> <p>I was literally shaking for the last couple of days. I started feeling queasy and faint, and got sick on the last day. I apologized for letting her down. I told her all this. She didn't tell me to scale it back.</p> <p>The only parts I didn't write were Jeremy's Story, Caryma's Story (though I edited them), and maybe 5 other pages. THEN I wrote 2 more articles the following week, after already running myself ragged.</p> <p>I came up with the full Hategate title too & inputted ideas on the cover. It was a collective effort, yes, but for people to reduce me to "admin assistant" is a boldfaced lie & erasure, considering this thing would not exist as it is without the actual principal writer.</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN claiming ownership over my project that I invited her to join.</p> <p>HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.</p>	<p>Shares private information</p> <p>Claims ownership of HateGate</p> <p>Toxic dependency</p>	Link
36.	23-12-15 0241 Lawyer Next Door	36	<p>Snippets from The Making of #Hategate (aka how I made myself sick writing this thing and didn't even get a lousy t-shirt 🤢🤮)</p>	<p>Attached screenshots include our private DMs.</p>	<p>Shares private information</p> <p>Claims ownership of HateGate</p>	Link

37.	24-04-26 1321 Lawyer Next Door	37	<p>UPDATE: The Crown decided my charges will be withdrawn in Dec 2024. I will NOT wait until then. I am contacting Crown next week to arrange for a trial date.</p> <p>I'm calling their bluff. Let's put ALL evidence on trial. Let EVERYBODY know what really happened.</p>		<p>Claims false police report</p> <p>Charges</p>	Link
38.	24-04-26 1404 Lawyer Next Door	38	<p>Legal profession will be put to shame @LawSocietyLSO #LawTwitter - Manipulation, exploitation, love bombing, fraud, robbed of my #Hategate donations, lies to police - while her BF Lee runs SP411 (online brothel), threatens me, hacks privileged convos & posts about it on Substack.</p>	<p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN falsely implies she is owed money.</p> <p>It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>Claims false police report</p> <p>Claims money is owed</p> <p>Conspiracy</p> <p>Indirect communication – LSO</p> <p>Charges</p>	Link
39.	23-12-12 2119 Direct communication		<p>The unpacking of the #Hategate FOIP papers took me 2 days. There were 21 or 22 packages, approx. 50-60 pgs each from what I recall. I read every page, 19 out of 21 pkgs, & made notes into a 110pg doc. That was intense labour.</p> <p>THEN there was research that went w/ writing Hategate itself. Parts of it triggered my PTSD and I was bawling through many parts. Cue further insomnia.</p> <p>It was agony, but I still met our self-imposed deadline. I slept maybe 2-3 hrs at best across almost 10 days to pull this off.</p>	<p>Attached screenshots include our private DMs.</p> <p>HATEGAN claiming ownership over my project that I invited her to join.</p> <p>HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.</p> <p>This is direct communication because HATEGAN’S tweet is in response to one of my own threads. She circumvented being blocked from my profile by replying to another</p>	<p>Shares private information</p> <p>Claims ownership of HateGate</p> <p>Toxic dependency</p> <p>Direct communication</p>	N/A

			<p>I was literally shaking for the last couple of days. I started feeling queasy and faint, and got sick on the last day. I apologized for letting her down. I told her all this. She didn't tell me to scale it back.</p> <p>The only parts I didn't write were Jeremy's Story, Caryma's Story, and maybe 5 other pages. THEN I wrote 2 more articles the following week, after already running myself ragged.</p> <p>I came up with the full Hategate title too & inputted ideas on the cover. It was a collective effort, yes, but reducing me to "admin assistant" is a boldfaced lie & erasure, considering this thing would not exist as it is without the actual principal writer.</p>	account (possibly her own alternate account) in the thread, but her reply tagged me.		
40.	23-12-22 1850 a Police wellness check	1	<p>IMPORTANT UPDATE</p> <p>Tonight marks one week since police showed up at my doorstep for a "wellness check" that followed a fake 911 call supposedly placed from my cell phone.</p> <p>This happened within 2 hours of me posting that I planned to testify as a witness for those who were harmed.</p>	I have no knowledge of any spoofed Caller ID incident.	Conspiracy Projects desire for vengeance Charges	Link
41.	23-12-22 1850 b Police wellness check	2	<p>My phone records prove I didn't place the call. My CallerID was spoofed, and this will be investigated. There are also signs my email may have been tampered with.</p> <p>Anyone who knows me, knows I would never call police, under any circumstances, because of trauma I experienced in my childhood/teen years.</p> <p>And that's exactly why this is happening.</p>	<p>I have no knowledge of any spoofed Caller ID incident.</p> <p>I have no knowledge of any email tampering.</p>	Conspiracy Projects desire for vengeance	Link

42.	23-12-22 1850 c Police wellness check	3	<p>Within hours of this incident, I retained an experienced senior lawyer from a leading criminal law firm with an impressive track record.</p> <p>No amount of intimidation will stop me from defending myself or telling the truth. I’ve battled many monsters in my day – as a teenage girl, my testimony put the leader of the Heritage Front and two other men behind bars, and contributed directly to shutting down the Heritage Front.</p> <p>I look forward to taking the stand again to tell the truth. If you could contribute even a few dollars for the retainer, please send an e-transfer to elisa@elisahategan.com or http://paypal.me/elisahategan</p>	HATEGAN portrays herself as the victim of intimidation and harassment, shifting blame onto me as the aggressor.	Solicits donations Charges	Link
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43.	23-12-25 1940 Various allegations		<p>NOTE ABOUT #HATEGATE FROM ITS PRINCIPAL AUTHOR</p> <p>Until you are exploited into pouring your heart & soul into an article that wouldn't exist without you, and several others before it</p> <p>Until you get literally sick from overworking on something that benefits only those who exploited you</p> <p>Until you are reassured by someone you love and trust that your concerns & gut instinct are wrong – and you have no reason to believe they're lying because they're privy to legal files inaccessible to the public</p> <p>Until you research, then write the bulk of an article that exonerates your lawyer friend's other prospective client, following the promise that a podcast will be made to exonerate you too</p> <p>Until you are discarded within a fortnight of publication because your physical exhaustion & mental suffering is inconvenient, and they don't want to split cash and contacts earned from your emotional labour</p> <p>Until you are cut off from donations, funding, and media contacts that emerge from your work</p> <p>Until you are cut off from news that your work is being used by defence lawyers across the country to generate bail hearings & new defences for their clients, while you are left without support or protection</p> <p>Until you are abruptly ghosted & blocked by your lawyer friend's boyfriend because he is threatened & emasculated by your closeness to his girlfriend</p> <p>Until solicitor-client privilege is breached and your confidentiality is violated when said lawyer's boyfriend discloses personal conversations in a blog and via social media – and you still have no idea if he intercepted every message sent to her, since he publicly admits to being the one who blocked you</p>	<p>Attached screenshot of @jasonlo18188734 (real name unknown) remarking on HATEGAN'S public tweets.</p> <p>HATEGAN claiming ownership over my project that I invited her to join.</p> <p>HATEGAN falsely implies she is owed money.</p> <p>HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.</p> <p>It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.</p> <p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN engages in coercive control with reference to suicide.</p> <p>I have no knowledge of any spoofed Caller ID incident.</p>	<p>Claims money is owed</p> <p>Claims false police report</p> <p>Claims ownership of HateGate</p> <p>Toxic dependency</p> <p>Expresses contempt for my partner</p> <p>Conspiracy</p> <p>Coercive control</p> <p>Charges</p>	Link
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			<p>Until you hear absolutely nothing from your friend in two months, and worry constantly about her wellbeing, and your phone/email system show NO MESSAGES FROM HER WHATSOEVER in those 2 months - and suddenly you are contacted by police and informed that you will be arrested</p> <p>Until you are arrested based on a false police report pre-emptively filed to stop you from publishing an evidence-backed rebuttal of a defamatory Substack blog that will impact a lawyer's license, career & livelihood</p> <p>Until you understand that every hope & promise you were told about the future, was most likely a lie intended to exploit you when you had nothing left – no family, friends, or future</p> <p>Until you understand how love, strong emotions and false promises were used to extract everything from you, before you are discarded like garbage by someone who knew they were your lifeline and monopolized it</p> <p>Until you are defamed, degraded & dehumanized into self-harm and suicidal ideation by those who praised you and called you a "hero" back when they still needed your work to build up their "brand"</p> <p>Until your cell phone Caller ID is spoofed to make fake 911 calls to police as an intimidation tactic (despite full knowledge of your childhood trauma involving police)</p> <p>Until you have experienced the trauma & exploitation I lived through</p> <p>You don't get the right to declare that my writing is “for attention”</p> <p>You don't get to follow me & still complain to your comrades that I shouldn't be doing this publicly</p> <p>Until you know the things I know and have endured the things I have, your misogynist opinion means shit Get used to it.</p>			
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44.	23-12-25 2022 Lisa LaFlamme	1	Thank you for appreciating my article & investigative work @LisaLaFlamme_ - please allow me to introduce myself as the principal author of #Hategate. I know we weren't formally introduced, but here I am. Thank you for believing it should be "front page news".	Attached screenshot of an email sent by LISA LAFLAMME to me. HATEGAN claiming ownership over my project that I invited her to join. HATEGAN tags LAFLAMME, presumably to have her reach out to one or both of us about this situation.	Shares private information Claims ownership of HateGate Indirect communication – colleague	Link
45.	23-12-25 2114 Lisa LaFlamme	2	You were the only news anchor I watched every night @LisaLaFlamme_. I might be in the gutter looking up at a starless sky, but the truth is: I wrote something you found admirable. Me - garbage me, inconvenient worthless riffraff me, wrote something that caught your attention. ME	HATEGAN employs self-deprecation to garner sympathy while subtly boasting about catching the attention of LAFLAMME. This is a calculated attempt to ruin my professional relationship with LAFLAMME.	Indirect communication – colleague	Link

46.	23-12-27 0324 False police report		<p>A CURIOUS THOUGHT OCCURRED TO ME...</p> <p>I wonder if a lawyer who files a false police report against a client might use the pretext of solicitor-client confidentiality to avoid producing any evidence of alleged “multiple warnings” they supposedly sent this client before involving police to press criminal charges.</p> <p>Since both parties know perfectly well that not ONE such message was EVER sent to the client by the lawyer or their representatives, I think it’s a plausible hypothesis. Especially since the exception to disclosing solicitor-client communications extends to very specific situations only - a lawyer can breach confidentiality to report a crime, for example, but cannot disclose other exchanges.</p> <p>Perhaps a gullible young cop might be convinced to take the lawyer at their word, and arrest without a proper investigation - an unconscionable abuse of authority and process. But with the "innocence at stake" exception, it goes both ways.</p> <p>A good consigliere would have advised about thinking things through, and never bluffing unless the other side is sure to fold.</p>	HATEGAN falsely accuses me of filing a false police report.	Claims false police report	Link
					Maligns police	
					Charges	

47.	23-12-27 2135 False police report		<p>A FIGHT FOR ACCOUNTABILITY AND JUSTICE **Please read the entire post**</p> <p>I don't have a criminal record. I've written articles on political extremism, investigative pieces like #HateGate, and I've been interviewed by countless media organizations.</p> <p>My 1994 testimony against 3 neo-Nazis single-handedly resulted in convictions & jail sentences, and contributed to shutting down the Heritage Front, Canada's largest white supremacist group in modern history.</p> <p>I have done nothing wrong.</p> <p>You don't have to like me or my politics, to understand that what happened to me should not happen to anyone. My story illustrates just how easily you too - anyone, for that matter - can be framed & criminalized by a judicial system that cares less about truth & transparency, and more about upholding power and marginalizing the powerless. A system where, to quote the lawyer involved in this story, "discretion is where justice goes to die".</p> <p>This is what happened:</p> <p>On November 29-30, I was informed by police at Toronto's 14 Division that I would be charged with "Harassment by Repeated Communication with Person". I was told by the arresting cop that there was "credible evidence" to indicate I had been given "many, multiple warnings" to stop emailing my lawyer friend and work collaborator for the past year.</p> <p>This is false. It's a straight-up lie. NOT ONE MESSAGE exists to prove this.</p> <p>It is clear to me, and to anyone who examines my email and phone records, that I was arrested without a proper police investigation, solely on the word of a lawyer who filed a false police report. This is an unconscionable abuse of authority and process.</p>	<p>Attached screenshot of HATEGAN'S email inbox with my name in the search bar.</p> <p>HATEGAN falsely accuses me of filing a false police report.</p> <p>I had several conversations with DETECTIVE UMBRELLO about whether HATEGAN knew or ought to have known her repeated attempts to communicate were unwelcome, including that Toronto Police advised they issued HATEGAN a caution to stop contacting me.</p> <p>It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.</p> <p>HATEGAN responds to being charged with criminal harassment by broadcasting lies and half-truths to sway public opinion against me, as well as threats to retaliate. This is harassment in and of itself considering what HATEGAN believes about the power of words:</p> <p><i>A lifetime ago, I stood on a stage, a 17- year-old girl barely tall enough to see over the podium, and made skinheads cheer with hate. At age 30, I stood on another stage and read a poem that made an audience weep. Such is the power of words – they can either uplift or uproot lives, plant seeds of hope or hate into others. Words don't just wield power – they are power.</i></p> <p>HATEGAN has a pattern of relying on "speculation, unfounded allegations, and conspiracy theories." The Ontario Superior Court of Justice deemed her claims "frivolous and vexatious."</p>	<p>Claims false police report</p> <p>Expresses contempt for my partner</p> <p>Maligns police</p> <p>Conspiracy</p> <p>Charges</p> <p>Coercive control</p>	Link
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			<p>I believe the false police report was filed as a measure to stop me from publishing an evidence-backed article that would expose unprofessional and wrongful activities which are very likely to impact this lawyer’s license and ability to practice law.</p> <p>My last email from my lawyer friend is dated Oct 2. My last phone call from her came at the end of September, days before her controlling boyfriend (who has her passwords and monitors all her emails and social media accounts) seized control of our communications and blocked me, interfering with her duties of care & confidentiality, among other Rules of her profession.</p> <p>On October 7, her boyfriend admitted in a public Substack blog that HE was the one who had actually blocked me - he stated it was an "ultimatum" to his girlfriend, because he felt threatened by our close relationship, and felt that my suicidal ideation was bad for her "brand". (I won't provide a link to his Substack, but it's still live as of today's date).</p> <p>On and about Nov 18 – less than two weeks before police informed me that I was going to be arrested – I announced (on Twitter and by email/text message) that I was going to publish an article that would provide a rebuttal to the defamatory Substack post written by the lawyer’s boyfriend, where he breached solicitor-client privilege to disclose confidential discussions and defamatory lies about me.</p> <p>I never heard from her, or any of her representatives. Two months of complete silence, then arrest.</p> <p>When I asked the arresting cop point blank, “Have you actually SEEN these alleged cautions/warnings she says she sent me?” she stuttered and wouldn’t give me a straight answer, leading me to believe that my arrest happened without any actual investigation - simply on the lawyer’s say-so.</p> <p>This is Kafkaesque, and reminiscent of the treatment people experienced when I was a child in communist Romania. How can police,</p>			
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			<p>in a supposedly free & democratic country like Canada, arrest people without investigation, strictly on hearsay and false allegations?</p> <p>My hypothesis is that this lawyer, already in a position of authority and trustworthiness by virtue of her profession, used the pretext of solicitor-client confidentiality to avoid producing the nonexistent “multiple warnings” she alleges she’d sent, before involving police to press criminal charges.</p> <p>My “repeated communications” consist of:</p> <p>1) emails requesting information re. Hategate donations / feedback / contacts</p> <p>2) requests to take down a defamatory Substack blog that breaches solicitor-client privilege, and</p> <p>3) pleadings for an answer – trying to understand & process what was happening & why. I'd had a breakdown, suffered from suicidal ideation, and begged for "just one word" of explanation. But not a single word came, leaving me to wonder if she had even received my messages (since her boyfriend admitted to being the one who seized control of our communications).</p> <p>I literally went from not knowing if she had received a single message from me (and worrying about her wellbeing, while I struggled to understand how/why she would allow her boyfriend to breach solicitor-client privilege and defame me publicly), to being arrested.</p> <p>No warnings, no cautions, NOTHING to inform me that my messages had even been read, much less that they were “harassment”. To this day, I don’t even know if she’s read any of my messages, or if they were intercepted and deleted by her boyfriend.</p> <p>I welcome any forensic investigation of all my emails, internet and phone records to prove this. And although I’m pretty sure that polygraph tests are not admissible in Canadian courts, if anyone wants to pay for one, I will gladly take it to prove that every word I’ve said is true.</p>			
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			<p>What I have experienced thus far is shocking, and left me shaken and traumatized. I am now forced to come up with thousands of dollars to pay for legal defence, money I don't have. I can't afford counselling either, although the trauma I've experienced as a result of these actions will take a very long time to process, much less heal.</p> <p>I intend to pursue every legal avenue in my means to seek recourse for this miscarriage of justice, and to ensure that those responsible for this malicious prosecution will be held accountable.</p>			
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48.	23-12-28 0214 Implied threat of releasing private info		<p>Even if I publish it now, she will likely deflect to the criminal charges against me to allege that I am "harassing" her and she's the victim, rather than the other way around. But there's approx 2 gigabytes worth of communications between us to show exactly what happened - all evidence that will soon be before the courts.</p> <p>Oh, but the irony! To think, I was going to hold back in my original Substack rebuttal article, because I didn't want to disclose things that might actually impact her law license. But now, I don't have a choice but to disclose it for my defence.</p> <p>I will also likely be subpoenaed to testify in other legal matters.</p> <p>I guess they didn't think this through.</p>	<p>HATEGAN engages in coercive control by stating that she would have refrained from disclosing private information (which she was leaking all along) but now will release everything due to being criminally charged.</p> <p>After permanently blocking HATEGAN on Twitter, she sent me an email threatening to publish “everything” (our private correspondence) if I did not unblock within five minutes. This is a form of coercive control.</p>	<p>Shares private information</p> <p>Charges</p>	Link
49.	23-12-30 1402 Cryptic tweet		<p>If I were the lawyer who RTd this last night (then scrambled to undo the RT), I would ask myself, "What makes me think she will be unrepresented?"</p> <p>Using a contingency retainer to file a claim against a police dept/lawyer for misconduct/malpractice isn't reinventing the wheel.</p>	<p>HATEGAN falsely suggests that I retweeted something about self-represented litigants but later removed it, implying I had doubts about whether she retained a lawyer.</p> <p>I did not retweet anything as she suggests and have never made any public comment about HATEGAN’S court case.</p>	<p>False claim - miscellaneous</p>	Link
50.	24-01-06 1318 Charges		<p>If a Crown Prosecutor doesn’t believe a word a lawyer is saying, if their first reaction is “You’re fucking kidding, fuck you”, if they think what the lawyer’s doing is a “Bitch Move”... if I triggered that reaction, I would engage in some critical self-examination before I risked the boomerang effect of the CJS.</p>	<p>HATEGAN characterizes my actions as triggering negative reactions from the Crown, suggesting I am unethical or manipulative.</p>	<p>Charges</p> <p>Maligns Crown</p>	Link
51.	24-01-07 1542 False police report		<p>After investing in someone else’s “brand” for over a year and encouraging her to rebrand & remarket herself as a “journalist”, to the point I helped write her articles & many captions, I didn’t think my ROI would consist of getting arrested on a false police report & having to find thousands of dollars I don’t have for a retainer - while my former protégé, who still owes me money, boasts about being featured in a newspaper she used to mock & insult.</p>	<p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN makes it clear that she stalks my tweets.</p>	<p>Claims false police report</p> <p>Stalking</p> <p>Charges</p>	Link

52.	24-01-09 2009 Blocked by Ezra Levant		I just noticed I was blocked by Ezra despite not interacting with him, so I reciprocated. I'm guessing he's mad that I declined his invitation to interview us after #Hategate came out? Whatever.			Link
53.	24-02-04 0044 Ownership of words		Back in Sept 2023 I collabed on an (unpublished) article that aimed to tie @CUPEOntario to Antifa. One issue I outlined was the likely cross-pollination of ideas & stances across unions & activist groups. Funny how my words are still used even after I revoked permission #HateGate	HATEGAN makes it clear that she stalks my tweets . HATEGAN cannot reasonably claim ownership over the concept or word “cross-pollination.”	Stalking False claim – miscellaneous	Link
54.	24-02-08 0500 Soliciting my contacts	1	To all #HateGate readers & supporters: Did you ever send a donation to support / fund our journalism to either the HateGate website (before the Make a Donation buttons were deleted without my consent) or directly to my co-author? If so, my DMs are open - I want to hear from you.	HATEGAN falsely implies she is owed money. HATEGAN asks my readers and supporters to contact her.	Claims money is owed Solicits my followers	Link
55.	24-02-08 1231 Soliciting my contacts	2	PLEASE READ: I need your help. If you read any of the articles listed below, if you're a #HateGate reader, or just a fan - if you donated a single dollar to support our investigative journalism after reading these articles, I need to hear from you. DMs are open. Pls reach out.	Attached screenshot is a list of articles where HATEGAN provided input. Everything was published in my name because 1) I was the primary author, and 2) HATEGAN explicitly did not want to be named because she claimed she could not withstand any negative attention. HATEGAN asks my readers and supporters to contact her.	Solicits my followers	Link
56.	24-02-12 1647 Blames me for Derek Harrison		More lies in @Derekrants' #memekampf: There may be bad blood between me & Kurt Phillips, but the description of our former friendship is WRONG. FALSE. BS. He did not "manipulate & control" me. Who put these lies in your head, Derek? I can guess I WILL take legal action #HateGate	HATEGAN’S use of #HateGate implies I misled DEREK HARRISON. I have never communicated directly or indirectly with HARRISON about HATEGEN apart from him sharing his DMs with her where she was ranting and spreading falsehoods about me.	Projects desire for vengeance False claim – miscellaneous	Link

57.	24-02-24 1436 Sharing my DMs	1	There is some confusion over the authorship of our April 2023 piece on Exploitation of Children for Political Gain. To clarify - this was a collaboration. I took a 1st draft, edited & added new sentences to enhance it. My work partner called my additions “the cleanest take down”.	Attached screenshots include our private DMs and post from @Vancouverismism (BRETT STEWART) calling me a “plagiarist.” HATEGAN QTs herself soliciting contact from anyone who has ever read my work.	Shares private information Solicits my followers	Link
58.	24-02-24 2048 Ownership of words	2	WHY am I not upset?! Of course I am. Work done by 2 ppl benefitted only 1, who didn't share contacts & donations. My arrest traumatized me, though news I received yesterday changes everything. You wanna know WHY? I suspect you already know why No greater blinders than hope & love	Attached screenshots include post from @Vancouverismism (BRETT STEWART) repeating HATEGAN’S false allegation that I filed a false police report. I have no knowledge of what news HATEGAN supposedly received.	Shares private information Toxic dependency	Link
59.	24-02-26 0550 Alluding to my bio		RTs ≠ Endorsements? 🙄 BUT RTs/Endorsements ≠ Insurance for legal bills & damages for libel. Or an offer of pro bono representation, @Derekrants	HATEGAN uses language from my Twitter bio and tags DEREK HARRISON. Elsewhere, HATEGAN falsely suggests I induced HARRISON to make inaccurate statements about her.	False claim – miscellaneous	Link
60.	24-02-26 1816 Wrongful arrest	1	#HateGate UPDATE: Since being wrongfully arrested for “criminal harassment” in Dec 2023, I've lived in constant dread & fear of retaliation. I didn't want to disclose what is going on, but the escalation of troubling events in the last 2 months leaves me no choice. I am afraid.	Attached screenshot is a Word document with extensive list of false allegations.	Conspiracy SeriousMother Claims ownership of HateGate Claims money is owed Projects desire for vengeance	Link

					False claim – miscellaneous Maligns police Charges	
61.	24-02-27 2050 Alluding to my RTs	2	I can't imagine retweeting this guy just to spite someone who was exploited. Every time she mentioned this slur, I felt her pain. I'll always support freedom of speech. But targeting an entire race w racist/homophobic slurs only foments hate & gives ammo to the censors.#HateGate	Attached screenshots of DEREK HARRISON using the slur “Paki.” HATEGAN is referring to me when she says, “Every time she mentioned this slur, I felt her pain.” I have never retweeted HARRISON in relation to HATEGAN.	False claim – miscellaneous	Link
62.	24-03-06 1111 Ex friend		Grateful for the lovely crowd attending my 1st in-person talk in 3 yrs at @NCJWCToronto (my 4th NCJW branch). It's bittersweet too: I planned to introduce my ex-friend as a speaker tonight, part of interfaith work that never ensued. Conflict & rage-farming won over peacebuilding.	HATEGAN wanted to do speaking tours at synagogues, mosques, and churches together. She referred to this plan numerous times in her unwanted correspondence towards me, especially after Hamas attacked Israel on October 7, 2023. I was never keen on this idea because it made me feel tokenized.	Toxic dependency	Link
63.	24-03-08 1528 Cryptic poll		Quick Poll: The number 89,428 refers to: Money I spent on lawyers 14.3% Word count -new affidavit 45.7% My age in cat years 5.7% Trolls/bots I've blocked 34.3%	HATEGAN is notorious for submitting lengthy affidavits with salacious gossip and innuendo .		Link

64.	24-03-13 2002 Rewriting her story	1	<p>Ok, so posting the former legal names of people who formally changed their name to match a new identity is deadnaming, yes?</p> <p>And posting the real names of the trolls who do it is par for the course, ya?</p> <p>Good thing someone's REAL name will come out soon. #Hypocrisy, thy name is --</p>	<p>Attachment is screenshot of seemingly unrelated tweet from my follower MITCH HANCOCK.</p> <p>“Deadnaming” refers to the act of calling a transgender person by an incorrect name, which does not apply here. HATEGAN legally changed her name after leaving the Heritage Front. That name change is public record, and HATEGAN herself has shared her former name.</p> <p>HATEGAN makes an implied threat to doxx my partner’s name.</p>	Projects desire for vengeance	Link
65.	24-03-13 2125 Rewriting her story	2	<p>More hypocrisy from folks who look the other way, tolerate & endorse the creepy psycho who posted my 2009 change of name docs, 1994 neoNazis' lies, smeared & threatened me for what I did as a MINOR 30 yrs ago, to cover up his/gf's wrongdoing. But let's not dig up 12 yo articles?</p>	<p>HATEGAN falsely accuses my partner of running @seriousmother.</p> <p>HATEGAN admits to digging up a twelve-year-old article about me that she circulated among my online harassers (DEANA SHERIF, JOHN THIBEAU, BRETT STEWART) to smear me as antisemitic. That article was sent to JOHN MOORE to try and get me kicked off his radio show as a contributor.</p>	SeriousMother Stalking Collaborates with my harassers	Link
66.	24-03-13 2132 a Rewriting her story	3	<p>This has gone on long enough.</p> <p>I will soon contact BC police over the threats & harassment I've experienced. I suspect that after they visit "Mary-Ann Watson", it will come out that she's not the person posting under my creepy stalker's account. And then the truth will come out.</p>	<p>HATEGAN acknowledges that @seriousmother has been linked to MARYANN WATSON yet falsely implies my partner runs the account.</p>	SeriousMother Harasses third party – client	Link

67.	24-03-13 2132 b Rewriting her story	4	<p>I was in HF as a 16yo minor. At 18 I defected, testified & helped to shut them down.</p> <p>1. I was NOT the first person to be charged w/a hate crime 2. I did nothing wrong & charges were withdrawn months later 3. I caused no harm to @cityoftoronto citizens</p> <p>I'm going to police. ENOUGH.</p>	<p>HATEGAN gets upset if anyone does not take her portrayal of her life story at face value. HATEGAN is rebutting @seriousmother, whose research suggests discrepancies in HATEGAN'S version of events.</p> <p>HATEGAN was, in fact, charged under the hate crime section of the Criminal Code.</p> <p>HATEGAN'S threat to go to police indicates she feels harassed by having others talk about her, meanwhile she persists in posting about me. The key difference is that @seriousmother relies on verifiable public information, whereas HATEGAN fabricates salacious conspiracies.</p>		Link
68.	24-03-13 2239 Rewriting her story	5	<p>This stalker account has made physical threats to me - it's enough to get the cops involved & get a production order on the IP.</p> <p>Furthermore, posts made by this account violate an injunction order, encouraged others to harass & attack me, and deadnamed me.</p> <p>ENOUGH IS ENOUGH, Lee.</p>	<p>HATEGAN falsely accuses my partner of running @seriousmother.</p> <p>To my observation, @seriousmother has not made any physical threats towards HATEGAN or anyone else.</p> <p>It is unclear what injunction order HATEGAN is referring to, or what constitutes incitement to harass or attack. "Deadnaming" is not an applicable concept.</p>	<p>False claim – miscellaneous</p> <p>Expresses contempt for my partner</p>	Link
69.	24-03-13 2340 Rewriting her story	6	<p>Attacking me to deflect from a 2012 event won't work. Delete all posts about me within 24 hours or I WILL contact police in ON+BC re your threats & harassment. My cop phobia be damned.</p> <p>You know what you did to me & others. It's a matter of time before you face legal consequences.</p>	<p>HATEGAN casts a wide net on who to blame for @seriousmother.</p> <p>HATEGAN has a pattern of relying on "speculation, unfounded allegations, and conspiracy theories." The Ontario Superior Court of Justice deemed her claims "frivolous and vexatious."</p> <p>HATEGAN'S own assessment of being wronged is not reliable.</p>	<p>Conspiracy</p> <p>False claim – miscellaneous</p> <p>Harasses third party – client</p>	Link

70.	24-03-14 0127 Rewriting her story	7	<p>Shawnigan Lake has approx 8500 residents. I bet the police dept there is small and they know most folks, or they can find her via FB. It won't take long for them to locate MAW/MP to rule her out as suspect of criminal harassment & threats.</p> <p>And then, ON/QC police will be notified.</p>	<p>HATEGAN hints at doxxing my client MARYANN WATSON.</p> <p>HATEGAN falsely accuses my partner of running @seriousmother.</p>	Harasses third party – client	Link
71.	24-03-14 0218 Rewriting her story	8	<p>How does that old song go again?</p> <p>"You've gotta fight / for your rights / against buullies!"</p> <p>20 hours to go. Delete your harassing, libelous & threatening posts, or pay MAW double to take the rap for you</p> <p>Because I AM DONE.</p> <p>I wonder if there are outstanding warrants for you.</p> <p>Tiktok</p>	<p>HATEGAN quotes lyrics from a parody song I performed in June 2021.</p>	<p>Conspiracy</p> <p>Harasses third party – client</p>	Link
72.	24-03-14 1025 Rewriting her story	9	<p>Ok. I'm going to police.</p> <p>This is the last time I reference Lee's troll/proxy accounts before police get involved. It's criminal & antisemitic harassment. A hate crime.</p> <p>Let's see what warrants & criminal investigations you've been dodging for the last decade+. You belong in jail</p>	<p>HATEGAN falsely accuses my partner of running @seriousmother.</p> <p>My partner is Jewish and does not engage in antisemitism or hate crimes. By contrast, HATEGAN has been charged with hate crimes in relation to her time with the Heritage Front.</p> <p>HATEGAN is projecting about who belongs in jail.</p>	<p>SeriousMother</p> <p>False claim – miscellaneous</p> <p>Expresses contempt for my partner</p>	Link
73.	24-03-14 1101 Rewriting her story	10	<p>I am Jewish and been targeted for harassment, abuse & threats by an anon troll who lies about me, deadnames me, denies I'm Jewish & threatens me with violence. What will you do about it?</p> <p>@Safety @Torontopolice @UJAFederation @TorontoJewish @JewishOttawa @bnaibrithcanada @ca_thej</p>	<p>HATEGAN falsely accuses my partner of running @seriousmother.</p> <p>HATEGAN has privately expressed serious and disturbing disdain towards Jewish people and Judaism. For example, on Yom Kippur she made it a point to violate each of the five prohibitions and explicitly did not keep kosher.</p>	<p>SeriousMother</p> <p>False claim – miscellaneous</p>	Link

74.	24-03-14 1410 Rewriting her story	11	<p>Imagine being so psychotic that you start new anon accounts to throw your criminal harassment co-conspirator (MAW) under the bus, just to deflect attention from your control of the account & shady past.</p> <p>Too bad language patterns are a giveaway. You sound too much like yourself.</p>	<p>HATEGAN falsely accuses my partner of running “MAW [MARYANN WATSON] is fail at everything” account.</p>	<p>Conspiracy</p> <p>Harasses third party – client</p>	Link
75.	24-03-14 1422 Rewriting her story	12	<p>What are you going to try next? Take me out, like you said you wanted to do with Keven? How you joked abt it when we were at dinner with SF, and he joked that he could get you house arrest?</p> <p>Try it. I've documented EVERYTHING. You do anything to me now, there's a record of it all.</p>	<p>HATEGAN falsely suggests she is in physical danger from me or my partner.</p> <p>HATEGAN refers to us having dinner together with SHERIF FODA and attributes statements to him that were never made.</p>	<p>False claim – miscellaneous</p> <p>Expresses contempt for my partner</p>	Link
76.	24-03-13 2024 Affirmoir		<p>Majority rules - call it my Affimoir.</p> <p>Wrote 3 of these in 90 days for separate cases. 2 served/filed, 1 submitted. Largest one was 132K before I pared it down to essentials: ONLY 89K words. The total exceeded 150k words.</p> <p>Last time I wrote this intensely was #HateGate. The irony</p>	<p>HATEGAN is notorious for submitting lengthy affidavits with salacious gossip and innuendo.</p>		Link
77.	24-03-16 1805 YRP station		<p>Three hours+ later... everything has been documented.</p>	<p>Attached photo is HATEGAN standing outside York Regional Police station.</p> <p>Leading up to this, HATEGAN contacted my client MARYANN WATSON’S family members (husband and son) threatening criminal and civil consequences if the account @seriousmother did not delete its posts questioning the veracity of HATEGAN’S life story as recounted by her.</p> <p>HATEGAN has falsely accused my partner of running @seriousmother.</p>	<p>SeriousMother</p> <p>Harasses third party – client</p>	Link

78.	24-03-18 1728 Harassing 3rd party		I am the principal writer of #Hategate - I wrote two-thirds of it, and yet you don't want to mention my name? Why are you erasing me from my own work? You know damn well who I am, because my name is on the cover.	HATEGAN claiming ownership over my project that I invited her to join.	Claims ownership of HateGate	Link
79.	24-03-18 1805 3rd party pile on		RT @hatemail72: YOU.. Need to look this lady up! Shake rattle and roll.. she has made one heck of a name 4 herself.. more 2 come	Hatemail72 is quote tweeting false allegations about me and my partner made by HATEGAN.		Link
80.	24-03-18 2045 LawTwitter pointed Q based on lies	1	#LawTwitter Q: What if the wife in this scenario is a lawyer & the husband clones her phone/hacks privileged emails without permission, takes offence, calls the correspondence a "hit piece" on him, starts cyberstalking client & creates a defamatory blog to disclose secret convos?	HATEGAN’S allegations are delusional but clearly meant to refer to me. For the record, my phone is not cloned; my partner does not hack my privileged correspondence; HATEGAN is referring to a 14-page letter that was, in fact, a jealous hit piece against my partner; my partner is not cyberstalking HATEGAN; my partner did not disclose any secret conversations and does not run a defamatory blog.	Expresses contempt for my partner Indirect communication – colleague Conspiracy	Link
81.	24-03-18 2148 LawTwitter pointed Q based on lies	2	What if Wife turns around & blames Client for messages that offend Hubby (despite promising the convos were privileged)? What if she allows Hubby to read Client’s files & private DMs on history of abuse, then looks the other way as Hubby cyberbullies, defames & threatens Client?	HATEGAN’S allegations are delusional but clearly meant to refer to me. For the record, I do not have any client files on HATEGAN apart from some lawsuits she sent me to read (which I have not improperly shared), and I do not believe HATEGAN is being cyberbullied, defamed, or threatened, least of all by my partner.	Expresses contempt for my partner Conspiracy	Link
82.	24-04-02 0502 Blocked by Crier	1	LOL @thecriermedia: I co-author a dozen articles for you guys (and publish 1 in Dec '22) ALL UNPAID, and you unfollow me? 🤔🤔🤔 I DM'd Dean to tell him I ghostwrote those pieces & he didn't even reply. After sending me contracts last spring. How professional. For shame #HateGate	HATEGAN falsely implies she is owed money for editing articles. HATEGAN tags CRIER MEDIA, presumably to have them reach out to one or both of us about this situation.	Claims money is owed Indirect communication – colleague	Link

83.	24-04-02 0702 Lisa LaFlamme	2	<p>I wrote two-thirds of an investigative article that got @thecriermedia 80K views in under 24 hrs, got @LisaLaFlamme_ all excited, and earned my co-author thousands of dollars in donations which she kept all to herself - and you unfollow me?!</p> <p>What a joke. Shame on you. #HateGate</p>	<p>Attached screenshots are an email sent by LISA LAFLAMME to me, and private messages between me and HATEGAN.</p> <p>HATEGAN falsely accuses me of depriving her of “thousands of dollars in donations.”</p> <p>HATEGAN tags LAFLAMME and CRIER MEDIA, presumably to have them reach out to one or both of us about this situation.</p>	<p>Claims money is owed</p> <p>Claims ownership of HateGate</p> <p>Indirect communication – colleague</p>	Link
84.	24-03-21 1625 Cryptic message		<p>RT lyrics to Stupid Girl by Garbage:</p> <p>You pretend you're high Pretend you're bored Pretend you're anything Just to be adored</p>	<p>HATEGAN is aware that Garbage is one of my favourite bands and the lyrics seem to reflect her warped perception of me.</p>		Link
85.	24-03-21 1914 Bitter subtweet		<p>Writing, even to self-imposed deadlines, is not as easy as it seems. All the mentorship in the world doesn't replace grunt work, much less when the final product is motivated by revenge rather than illumination. Perhaps a new appreciation for the labour of ghostwriters is needed.</p>	<p>Earlier that week, I announced that I was writing an article about Israel Now. My online harassers posted several times to say I could not write without HATEGAN.</p> <p>Wolves in Sheep’s Clothing was my first article published on CRIER since terminating the working relationship with HATEGAN.</p>	<p>Stalking</p> <p>Exaggerates her influence</p>	Link
86.	24-03-23 1637 Police		<p>Actually, three times (that I’m aware of). Excluding the spoofed CallerID incident.</p> <p>Found out about call #3 when I went to police last Friday to report the relentless harassment, cyberstalking & threats.</p>	<p>HATEGAN referring to police wellness checks placed due to her explicit threats of self-harm and suicide.</p> <p>I have no knowledge of any spoofed Caller ID incident.</p> <p>I have no knowledge of HATEGAN being subjected to “relentless harassment, cyberstalking & threats.” This seems like projection.</p>	<p>Conspiracy</p>	Link

87.	24-03-23 1718 3rd party pile on		<p>RT @nejsnave (JENNIFER EVANS):</p> <p>Active malice and intentional endangerment.</p> <p>The trafficking is in revenge, not concern</p> <p>Is there anything more vile than weaponizing wellness checks</p>	<p>JENNIFER EVANS commenting on HATEGAN’S vague tweet about wellness checks.</p> <p>For the record, I have called in a few wellness checks based on legitimate concerns. HATEGAN has a pattern of using suicide threats as coercive control.</p> <p>I am suing EVANS for defamation in an unrelated matter.</p>	-	Link
88.	24-03-23 2319 Harassing 3rd party	1	<p>Excuse me, but I wrote two-thirds of #HateGate (57 pgs excluding cover/TOC) so the least you could do is mention my name too, given that I'm principal author.</p> <p>My name is on the cover, ffs. Someone already cited me in comments to you. Why are you snubbing me? #RememberMyName</p>	<p>HATEGAN claiming ownership over my project that I invited her to join.</p>	<p>Claims ownership of HateGate</p> <p>Harasses third party – follower</p>	Link
89.	24-03-23 2324 Harassing 3rd party	2	<p>Why not delete your tweet where you only cite ONE of TWO authors, and repost it with my name included?</p> <p>My name is on the actual cover of #HateGate. If you read it, you'd know.</p>	<p>HATEGAN claiming ownership over my project that I invited her to join and trying to pressure a stranger into deleting his tweet that mentions me.</p>	<p>Claims ownership of HateGate</p> <p>Harasses third party – follower</p>	Link
90.	24-03-23 2330 Harassing 3rd party	3	<p>Your tweet is misleading, because you've decided not to delete and add BOTH authors, or none.</p> <p>You citing ONLY Caryma as the author is a LIE.</p> <p>Your decision not to delete and repost is bs.</p> <p>#HateGate #RememberMyName</p>	<p>HATEGAN claiming ownership over my project that I invited her to join and trying to pressure a stranger into deleting his tweet that mentions me.</p>	<p>Claims ownership of HateGate</p> <p>Harasses third party – follower</p>	Link
91.	24-03-24 0049 Imposter syndrome on Purim		<p>Purim Sameach, everyone!</p> <p>Here's a throwback to 2016, when Purim, Easter & Holi fell on the same date and I wrote this - "Esther and Easter: How One Human Being Can Change The World". #Purim2024 #PurimSameach</p>	<p>Attached selfie is HATEGAN in a bright pink shirt.</p> <p>This was posted after I shared footage of myself at a Barbie-themed Purim party, for which I was dressed in bright pink.</p>	Stalking	Link

92.	24-03-24 0830 3rd party pile on		<p>RT @DiagolonMonkey:</p> <p>This thread is pretty important 2 take into consideration w regards 2 the #HateGate publication & how it came 2B</p> <p>I have my own personal story concerning troubling interactions</p> <p>There’s an ugly underbelly 2many things but ppl choose no 2look or support those who’ve been trampled</p>	<p>DiagolonMonkey commenting on The Lawyer Next Door thread.</p> <p>I have never interacted with DiagolonMonkey (real name unknown) apart from them soliciting legal services that I was unable to provide.</p>	-	Link
93.	24-03-30 1844 Cryptic messaging		#TikTok	<p>Attached photo depicts a solar eclipse.</p> <p>The meaning of this cryptic tweet was not initially clear, but HATEGAN subsequently released a salacious conspiracy thread on the date of the eclipse (April 8, 2024).</p>		
94.	24-04-01 0702 Cryptic messaging		Fiat iustitia et pereat mundus.	<p>Latin translation: Let justice be done, though the world perish.</p> <p>Cryptic message that seems intended to intimidate.</p>		Link
95.	24-04-05 0550 Blocked by Dean		Pretty sure it's related to my pinned thread. Loyalties to close friends taking precedence over professionalism and fair/unbiased conduct, would be my guess	<p>HATEGAN disparages my professional contact DEAN BLUNDELL, suggesting she was treated unfairly because of his loyalties to me.</p> <p>“Pinned thread” refers to her tweets about The Lawyer Next Door.</p>	<p>False claim – miscellaneous</p> <p>Harasses third party – colleague</p>	Link

96.	24-04-22 1600 Cryptic message	1	It's Riddle Time! #ChagSameach #Passover2024	<p>The clue is the name ADAM WATSON.</p> <p>I have no knowledge of this person. JOHN THIBEAU made posts that led me to discover WATSON has apparently listed my mother’s home address as his address on articles of incorporation.</p> <p>HATEGAN and THIBEAU appear to be working together to stalk my mom.</p>	<p>Stalking</p> <p>Collaborates with my harassers</p>	Link
97.	24-04-23 1424 Cryptic message	2	<p>Funny story to spill at the Seder table 🍷</p> <p>I'm hanging with my bestie last summer, when her bf demands she e-transfer cash to their lovable pet idiot to keep him happy, and she promptly obliged right in front of me.</p> <p>Ah, if only I had malleable morons at my fingertips too #LChaim 🍷</p>		<p>False claim – miscellaneous</p>	Link
98.	24-04-24 1528 Charges	1	<p>UPDATE: In Feb, my lawyer informed me the Crown was withdrawing my charges.</p> <p>Today, I was told the case gets dismissed on Dec 18.</p> <p>I AM INNOCENT I DIDN'T DO ANYTHING WRONG IF THEY HAD A CASE, IT WOULD'VE GONE TO TRIAL I'VE BEEN PENALIZED & SILENCED FOR A YEAR FOR NOTHING #HateGate</p>	<p>HATEGAN falsely accuses me of filing a false police report.</p>	<p>Claims false police report</p> <p>Charges</p>	Link
99.	24-04-24 1618 Conspiracy	2	<p>TEN DAYS after I announced I was writing a rebuttal to a Substack piece by Caryma's BF Lee, alleged SP411 CEO, police told me I'd be charged with criminal harassment.</p> <p>I believe it happened to stop me from disclosing Lee's sex industry acitivity & that she took my meds #lawtwitter</p>	<p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	<p>Conspiracy</p> <p>Projects desire for vengeance</p> <p>False claim – miscellaneous</p>	Link

100.	24-04-24 1634 Conspiracy	3	<p>I believe I have strong evidence of criminal activity, including but not limited to stalking people & REAL crim harassment. BUT for as long as this bogus charge is pending, I cannot file a complaint with the @LawSocietyLSO</p> <p>Do lawyers get special treatment from Crowns? #lawtwitter</p>	<p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	<p>Conspiracy</p> <p>Claims false police report</p> <p>Indirect communication – LSO</p> <p>Maligns Crown</p>	Link
101.	24-04-24 1904 Conspiracy	4	<p>#LawTwitter Your industry protects its own. The cost of a Crown doing favors for a lawyer:</p> <p>Since I was charged, got NO MORE projects/speaker gigs. I am seen as a criminal. Mental health crashed. Can't afford counseling. Borrowed \$7K legal costs</p> <p>Caryma didn't pay MONEY SHE OWES ME</p>	<p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p> <p>HATEGAN is the only one between us posting publicly and extensively about her criminal case.</p> <p>HATEGAN falsely states she is owed money.</p>	<p>Conspiracy</p> <p>Claims money is owed</p> <p>Maligns Crown</p>	Link

102.	24-04-24 2131 Conspiracy	5	<p>Not only does Caryma owe me money, her boyfriend Lee hacked our DMs, shared privileged convos in a Substack blog & threatened me via an anon X account.</p> <p>I reported him to @YRP before evidence came out showing him as SP411 CEO</p> <p>How can you let this happen? @LawSocietyLSO #LawTwitter</p>	<p>HATEGAN falsely states she is owed money.</p> <p>It is not accurate that my partner was intercepting my emails, text messages, or social media messages, or that any breach of solicitor-client privilege occurred.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>Claims money is owed</p> <p>Expresses contempt for my partner</p> <p>Conspiracy</p> <p>Indirect communication – LSO</p>	Link
103.	24-04-25 0422 Conspiracy	6	<p>Hey @LawSocietyLSO #LawTwitter Is it conduct becoming of your profession to have your boyfriend (the CEO/Owner of an online brothel) threaten, blackmail & extort sex workers, pimp your professional services in Backpage's Escorts section, and publish privileged convos on Substack?</p>	<p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	<p>Conspiracy</p> <p>Expresses contempt for my partner</p> <p>Indirect communication – LSO</p>	Link

104.	24-04-25 1328 Conspiracy	7	Hey @LawSocietyLSO #LawTwitter Is it ok for a lawyer's boyfriend (CEO/Owner of an online brothel) to apply a WWE Wrestling model of conflict-4-clicks to SP411 & the X account he co-owns, bec he thinks drama & rage-baiting brings in cash & traffic? Is it ok to provoke for profit?	<p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	Conspiracy Expresses contempt for my partner Indirect communication – LSO	Link
105.	24-04-25 1444 Conspiracy	8	Stay tuned for upcoming collages "Hey @LawSocietyLSO is it ok if your online brothel Admins are sex offenders & pedophiles?", "Hey #LawTwitter is it ok to suicide-bait sex workers & cause mental distress for lulz?" and other faves involving animal abuse & taunting ur Mafia rivals	<p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	Conspiracy Expresses contempt for my partner Indirect communication – LSO	Link
106.	24-04-25 2046 Conspiracy	9	<p>Hey @LawSocietyLSO #LawTwitter Is it ok for a lawyer to allow a boyfriend (CEO/owner of virtual brothel) access to emails so he can send unsolicited abusive messages & block on a whim?</p> <p>Is it ok if he suicide-baits sex workers & causes mental distress for clicks/laughs? #NotMyPimp</p>	<p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	Conspiracy Expresses contempt for my partner Indirect communication – LSO	Link

107.	24-04-26 2234 False police report	10	<p>I JUST GOT MY DISCLOSURE FILE - lawyer finally sent it today. And holy shit @LawSocietyLSO #LawTwitter</p> <p>I now have 100 PROOF that Caryma lied to police. I will be pursuing action for malicious prosecution & mischief as soon as this gets resolved at trial.</p>	<p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	<p>Charges</p> <p>Claims false police report</p> <p>Indirect communication – LSO</p>	Link
108.	24-04-27 0051 False police report	11	<p>You don’t tell an innocent person who hasn’t been convicted of any crime but is rotting in jail: “We know you’re innocent & we don’t have a case, but you have to wait a year to be released"</p> <p>I am innocent. I deserve to have my peace of mind set free. I deserve justice #LawTwitter</p>	<p>HATEGAN falsely accuses me of filing a false police report.</p>	<p>Claims false police report</p>	Link
109.	24-05-01 1424 Conspiracy	12	<p>Has the law caught up with virtual brothels in Canada, #LawTwitter?</p> <p>"They would write reviews of the girls they've slept with, what acts they would commit, how much their charged [...] This was a website designed, managed and run fully for prostitution."</p>	<p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p>	<p>Conspiracy</p>	Link
110.	24-05-02 1424 Defrauded	13	<p>I paid to register the domain #Hategate.ca. Caryma later deleted the Donation Buttons from the website without my permission (I guess so all donations went directly to her account).</p> <p>We agreed to split ALL profits 50-50% Never got a cent. I was defrauded</p> <p>@LawSocietyLSO #LawTwitter</p>	<p>HATEGAN falsely states she is owed money.</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>Claims money is owed</p> <p>False claim – miscellaneous</p> <p>Indirect communication – LSO</p>	Link

111.	24-05-02 1428 Defrauded	14	<p>Is “defrauded” too strong a word though? 🤔</p> <p>Let’s check the definition 🖱️</p> <p>Nah, got it right in the first place.</p> <p>Defrauded by a lawyer. #HateGate #LawTwitter @LawSocietyLSO</p>	<p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>Claims money is owed</p> <p>Indirect communication – LSO</p>	Link
112.	24-05-05 1706 Defrauded	15	<p>The fraud didn't start in Sept 2023. It started in Oct 2022, the day after I met Caryma IRL. She pitched a podcast that would exonerate my reputation. HER idea, not mine. Blinded by hope, I gave her info & labored for free for a year, her countless broken promises paving the way.</p>	<p>HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.</p> <p>HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction.</p>	<p>Retribution against Elizabeth Moore</p> <p>Toxic dependency</p>	Link
113.	24-05-05 1954 Jealousy	16	<p>Soon the friendship grew intense. We texted hours everyday. Finished each others thoughts, exchanged I love yous.</p> <p>Lee hacked our convos, became verbally abusive. She made excuses.</p> <p>As my feelings grew, I worked harder. Caryma knew how I felt & encouraged it,despite the toll on me.</p>	<p>HATEGAN makes it clear that she was emotionally dependent to an unhealthy degree.</p>	<p>Toxic dependency</p>	Link
114.	24-05-06 1322 Defrauded	17	<p>In the end, Caryma never made the podcast. I wrote my own story in #Hategate. I took her word that the men we defended were good guys, and trusted she would profit-share as promised.</p> <p>Instead, I was defrauded.</p> <p>These prophetic words haunt me to this day 🖱️ @LawSocietyLSO #LawTwitter</p>	<p>Attached screenshot is a from Word document. HATEGAN recounts a conversation at dinner with SHERIF FODA that is completely fabricated. FODA did not make any comments about Law Society discipline processes, nor did he provide HATEGAN legal advice.</p> <p>HATEGAN makes it clear that she wanted to use my voice to circumvent the Superior Court injunction.</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>False claim – miscellaneous</p> <p>Retribution against Elizabeth Moore</p> <p>Claims money is owed</p> <p>Indirect communication – LSO</p> <p>Harasses third party – colleague</p>	Link

115.	24-05-10 1334 Defrauded	18	<p>How Great Expectations lead to Great Disappointments: a conversation between Caryma & Elisa foreshadows the exploitation & defrauding behind #HateGate - the culmination of a year's worth of free labour & broken promises @LawSocietyLSO #lawtwitter</p>	<p>Attached screenshot is a from Word document transcribing our private DMs.</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>Indirect communication – LSO</p> <p>Shares private information</p>	Link
116.	24-04-24 1355 Ownership		<p>Here's a reminder to everyone posting about #Hategate: I am the principal author.</p> <p>I unpacked 19 FOI packages, wrote two-thirds of Hategate, was robbed of my share of donations & was targeted by a homophobic smear campaign by a racist Diagon member.</p> <p>I'm now scared of Diagon.</p>	<p>HATEGAN claiming ownership over my project that I invited her to join.</p>	<p>Claims ownership of HateGate</p>	Link
117.	24-04-24 1715 3rd party pile on		<p>RT @nejsnave (Jennifer Evans):</p> <p>You betcha. I have this, thanks to Elisa, and quite a bit more.</p>	<p>HATEGAN is communicating with JENNIFER EVANS about me, including sharing private messages.</p> <p>I am suing EVANS for defamation in an unrelated matter.</p>	-	Link
118.	24-04-25 1134 3rd party pile on		<p>RT KnyseGuise (possibly Sherwin Tjia):</p> <p>It looks like Caryma kept Elisa Hategan around as long as she was useful but once it came to actually paying her a share of the \$ donated to #hategate it was time to kick her to the curb and sic the cops on her. Let nothing get in the way of the gift.</p>		-	Link
119.	24-04-25 1243 Charges		<p>I told my lawyer no deals, no "staying" charges, no peace bonds. I wanted a TRIAL ONLY.</p> <p>Now I'm sentenced to what's tantamount to a peace bond WITH NO WAY to defend myself and show evidence of THEIR criminal activity, @LawSocietyLSO Rule breaches & being robbed of money I'm owed</p>	<p>HATEGAN falsely states she is owed money.</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>Claims money is owed</p> <p>Indirect communication – LSO</p>	Link

					Charges	
120.	24-04-26 1053 Harassing 3rd party		I am the principal author of #HateGate. I researched 19 out of 21 FOI packages & wrote EVERY WORD of the excerpts Caryma quoted. Then she robbed me of my shares of donations & had me arrested (on bogus charges soon to be dismissed), and @nationalpost erased me from my own work.	HATEGAN claiming ownership over my project that I invited her to join. HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money.	Claims money is owed Claims false police report Claims ownership of HateGate	Link
121.	24-04-26 1055 Harassing 3rd party		I am the principal author of #HateGate. I researched 19 out of 21 FOI packages & wrote EVERY WORD of the excerpts Caryma quoted. Then she robbed me of my shares of donations & had me arrested (on bogus charges soon to be dismissed), and @nationalpost erased me from my own work.	HATEGAN claiming ownership over my project that I invited her to join. HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money.	Claims money is owed Claims false police report Claims ownership of HateGate	Link

122.	24-04-26 1105 Harassing 3rd party		<p>Yeah, I'm not surprised. I don't have press connections, and Caryma refused to share opportunities & money from #Hategate.</p> <p>I was robbed & framed after her boyfriend Lee, the CEO/Owner of SP411 - a virtual brothel - hacked our DMs & blocked me. Exploited by a lawyer @LawSocietyLSO</p>	<p>HATEGAN claiming ownership over my project that I invited her to join.</p> <p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN falsely states she is owed money.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>Claims money is owed</p> <p>Claims false police report</p> <p>Claims ownership of HateGate</p> <p>Conspiracy</p> <p>Indirect communication – LSO</p>	Link
123.	24-04-26 1135 Charges	1	<p>I am NOT going to wait until December. I am going to push for trial. Will contact the Crown next week and arrange to go before the courts to set a trial date.</p> <p>I'm calling their bluff. Let's put ALL evidence on trial. Let EVERYBODY know what really happened. #BringItOn #Hategate</p>	<p>HATEGAN is QTing @KnyseGuise (possibly operated by SHERWIN TJIA), one of my online harassers.</p>	<p>Charges</p> <p>Claims false police report</p>	Link
124.	24-04-26 1154 Charges	2	<p>At this point, given all evidence + what I was told of the Crown's behind-closed-doors opinion, I believe I have a prima facie case for malicious prosecution @LawSocietyLSO.</p> <p>Once my ordeal is over, I will hold @TorontoPolice 14 Division, Caryma & all others involved accountable.</p>	<p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p> <p>HATEGAN tags LAW SOCIETY OF ONTARIO. This is indirect communication because her intent is to communicate with me through my professional regulator.</p>	<p>Claims false police report</p> <p>Maligns police</p> <p>Maligns Crown</p> <p>Indirect communication – LSO</p>	Link

125.	24-05-01 1934 Harassing 3rd party	1	<p>Could you also donate to the principal author of #HateGate. I wrote 57 out of 85 pgs excluding cover & TOC) & researched 19/21 FOI packages. I was robbed of my share of donations (never got a cent) & framed with a false police report.</p> <p>Please donate to elisa@elisahategan.com</p>	<p>HATEGAN claiming ownership over my project that I invited her to join.</p> <p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN falsely states she is owed money.</p>	<p>Claims money is owed</p> <p>Claims false police report</p> <p>Claims ownership of HateGate</p> <p>Solicits donations</p>	Link
126.	24-05-01 2227 Harassing 3rd party	2	<p>Just got blocked by @JimmyT2022, who urged everyone to donate to Caryma for bringing #HateGate to the world, which I wrote in majority.</p> <p>When I told him I was defrauded & robbed of my fair share of donations after writing two-thirds of #HateGate...I get blocked. Quelle surprise 🤔</p>	<p>HATEGAN falsely states she is owed money.</p>	<p>Claims money is owed</p> <p>Harasses third party – follower</p>	Link
127.	24-05-02 2144 Defrauded		<p>My title. My writing. My hashtag. My money to register #hategate.ca. My emotional & physical labour writing two-thirds of the damn thing after being promised 50% of all profits (never got a cent).</p> <p>And for what? To be defrauded & framed with bogus charges.</p>	<p>HATEGAN claiming ownership over my project that I invited her to join.</p> <p>HATEGAN falsely accuses me of filing a false police report.</p> <p>HATEGAN falsely implies she is owed money.</p>	<p>Claims money is owed</p> <p>Claims false police report</p> <p>Claims ownership of HateGate</p>	Link
128.	24-05-02 2202 Charges		<p>Earlier today we chose to set dates to bring the matter forward, and for a Judicial Pre-Trial (JPT) meeting in July.</p> <p>The December date is scrapped. I'm currently applying to get further disclosure.</p>		<p>Charges</p>	Link

129.	24-05-02 2218 Defrauded		<p>Thank you SO MUCH for the info.</p> <p>I asked her how much was coming in, when we met during our #Hategate celebration dinner.</p> <p>She and her BF denied there was anything, but I'd seen screenshots that said otherwise.</p> <p>TBH, imo we're talking thousands earned since Sept 2023.</p>	<p>HATEGAN falsely implies she is owed money.</p> <p>Less than \$1,000 was collected in donations specific to the HateGate Affair, which money was spent on illustrations, advertising, website hosting, and a celebratory dinner.</p>	<p>Claims money is owed</p> <p>Solicits my followers</p>	Link
130.	24-05-06 1924 3rd party pile on		<p>RT RukhsanaShukan:</p> <p>I never forget details and I remember this and I won't forget things that people do to others.</p> <p>I take character very seriously when I consider information sources I use.</p> <p>Cowardly behaviour can never lead to peace and liberation for anyone. Deception and dishonesty are cowardice.</p> <p>I remember what others never even knew.</p> <p>Anyway.</p>			Link
131.	24-05-08 0412 UofT	1	<p>This is me.</p> <p>What others see: Jew Nazi Hero Hater Lover Liar Truthteller Strong Weak Fearless Coward Vexatious litigant Zionist Queer Far-right far-left bridge-burner manhater ballbuster couples-breaker</p> <p>Out of the ash I rise with my red hair And I eat men like air. #Hategate</p>	<p>Attached selfie was taken at the University of Toronto and posted on my birthday.</p> <p>I have been documenting the campus encampment since May 2, 2024. This was made public on my social media posts, and my footage being featured by mainstream outlets.</p> <p>HATEGAN attended on May 7, 2024. She approached DAVID MENZIES to spread false and salacious rumours about me. She told him I should know that she would “Get me back” once her charges were withdrawn. MENZIES conveyed this message to me on May 8, 2024.</p>	<p>Stalking</p>	Link

132.	24-05-19 1152 Charges	2	Thanks. I wouldn't say happier, since I've been to hell & back and the mental scars are far from healed. But I'm more determined, resolute, and far less afraid to fight for myself. I WILL get justice for what happened. But first, my Pre-Trial is July 19 (I doubt it'll go further)		Charges	Link
133.	24-05-19 1300 False police report	3	I mean, they have no case. After getting the Discovery, I saw the ENTIRE PREMISE of my arrest is I "disobeyed multiple cautions/warnings" that DO NOT EXIST. They're scrambling to find them lol. Caryma lied, they took her word for it & arrested me. No investigation. 14Div is liable	HATEGAN falsely accuses me of filing a false police report.	Claims false police report Charges	Link
134.	24-05-19 1328 False police report	4	The case against me is as flimsy as the Spiderman meme. Nobody ever told me to stop emailing Caryma. Not even Caryma herself, who defrauded me for thousands of dollars & violated the Rules of her profession. Not ONCE did she say, “Don’t message me.” Not ONE caution from anyone.	HATEGAN falsely accuses me of filing a false police report. HATEGAN falsely states she is owed money.	Claims false police report Claims money is owed Charges	Link
135.	24-05-10 0747 3rd party pile on		RT RukhsanaShukan: I don’t like Caryma. She isn’t a nice person. Kindly don’t share her work like she’s fabulous, she’s not. I lost all respect for her after learning about the story of Elise Hategan and don’t wish to know her take on anything of import. Kindly do your your due diligence journalists or you will be removed from my small list of trusted individuals.		-	Link
136.	24-05-10 0822 3rd party pile on		RT RukhsanaShukan: Here’s a story for you lot, who don’t know what you don’t know. Read.		-	Link

137.	24-05-13 1513 Mother's Day		Tis Mother’s Day, when angry little boys with #mommyissues should offer bouquets of thanks to the women whose ID they hide behind. Even though mommy, stepdaddy & ur replacements uprooted to (then sold) Wildflower & left you in ON to seek ur fortune...again, behind women’s skirts.	<p>This cryptic tweet is hard to decipher, but Wildflower was MARYANN WATSON’S street address when she lived in Shawnigan Lake.</p> <p>HATEGAN appears to be hunting WATSON.</p>	<p>Stalking</p> <p>Expresses contempt for my partner</p> <p>Harasses third party – client</p>	Link
138.	24-05-14 2056 UofT		Shakedown for nuts by a UofT squirrel who almost mistook my leg for a tree. Usually I’d share but had nothing on me and for a sec there it seemed he was gonna chomp down on me instead 🐿️	<p>Attached video of squirrel appears to be filmed at the University of Toronto.</p> <p>I have been documenting the campus encampment since May 2, 2024. This was made public on my social media posts, and my footage being featured by mainstream outlets.</p> <p>HATEGAN is making indirect reference to one of my viral videos which featured a boy trying to lure squirrels with nuts.</p>	<p>Stalking</p>	Link
139.	24-05-19 1522 Conspiracy		<p>I agree. Canadians like to look down their noses at corruption in “third world” countries, but pretend it doesn’t exist when it’s right in front of their faces.</p> <p>When it comes to the “justice” system, the ‘boys in black’ cover for their own the same way as the ‘boys in blue’.</p>	<p>HATEGAN has a pattern of relying on “speculation, unfounded allegations, and conspiracy theories.” The Ontario Superior Court of Justice deemed her claims “frivolous and vexatious.”</p> <p>HATEGAN implies I am involved in corruption.</p>	<p>Maligns Crown</p>	Link

May 28, 2024

By Electronic Mail

D.C. Diana Vigna #82008

Toronto Police Service, 14 Division
Criminal Investigation Bureau

E: Diana.Vigna@torontopolice.on.ca

Dear Detective Constable Vigna,

**RE: SUMMARY FOR POLICE REPORT ON ELISA HATEGAN
23-2289886, 23-2312449, 23-2608706, 23-2842128, 23-2858414**

I. OVERVIEW

On December 10, 2023, Elisa HATEGAN was arrested and charged with criminal harassment. Her conditions include no direct or indirect communication with me.

Within hours of being released from the station, HATEGAN posted a series of tweets on X (formerly Twitter) titled "The Lawyer Next Door". The introductory tweet features an image of HATEGAN and me, photoshopped to depict a rip between us. It is pinned to the top of her profile page and has garnered over 116,000 views to date.

Since her arrest, HATEGAN has fixated on me. She attended the University of Toronto protest encampment where I was known to be working and conveyed a threatening message to me through a third party. She posted approximately 138 derogatory tweets that refer directly or indirectly to me, my partner, and/or my clients. This does not include hundreds of reposts to amplify her own content. One tweet was direct communication and approximately 20 tweets constitute indirect communication.

Only a few of HATEGAN's tweets (less than a dozen) within this timeframe are about her life or interests; her online activity focuses almost exclusively on her obsession with me.

HATEGAN has a long history of harassing private citizens. She was trained in harassment techniques by CSIS operative Grant Bristow during her involvement with the Heritage Front, a violent neo-Nazi group. She is subject to a permanent court order that prohibits her from mentioning her former best friend (also an ex-Heritage Front member) due to persistent harassment and defamation. HATEGAN intended to use me as a proxy to ruin her former best friend. When that failed, she turned her attention to harassing me, instead. **I do not believe she will stop on her own without police intervention.**

HATEGAN's ongoing actions constitute a sustained campaign of criminal harassment through false allegations, manipulation, threats, and the use of third parties. Her behaviour reflects a pattern of toxic emotional dependence, stalking, intimidation, and misrepresentations/lies aimed at damaging my personal and professional reputation and inciting others to harass me.

II. RELEVANT BACKGROUND ON HATEGAN

- **Past Affiliations:** Former spokesperson for the Heritage Front, a violent neo-Nazi group.
 - Joined as troubled youth who was in and out of group homes and foster care.
 - Described WOLFGANG DROEGE and ERNST ZUNDEL as father and grandfather figures, respectively.
 - Defected shortly after being charged with willful promotion of hatred. The case against her was withdrawn around the time she agreed to testify against her former associates.
 - Converted to Judaism approximately two decades later. There are reasons to question whether this conversion was made in good faith.
- **Previous Criminality:** Involved in hate crimes and harassment campaigns.
 - Fourth person in Ontario ever charged with [willful promotion of hatred](#).
 - Trained and coached by CSIS operative GRANT BRISTOW in techniques to monitor, stalk, and torment targeted individuals as part of the [“IT” Campaign](#).
 - Unsolved case involving a group home firebombed by the Heritage Front.
- **Pattern of Behaviour:** Forms toxic, obsessive relationships and spreads unfounded allegations and conspiracy theories.
 - Described by the Ontario Superior Court of Justice as relying on [“speculation, unfounded allegations, and conspiracy theories”](#) to make allegations against her former best friend, ELIZABETH MOORE FREDERIKSEN. The claim was ultimately dismissed as [“frivolous and vexatious.”](#)
 - Prohibited by permanent injunction from referencing MOORE FREDERIKSEN.
- **Initial Contact and Interactions:** Ingratiated herself with me to get me to enact vengeance by proxy on her former best friend.
 - Reached out under the pretext of not being restricted by the injunction because she is permitted to discuss her case with counsel. She was appealing the decision at the time.
 - Trauma bonded over the experience of dealing with mutual harassers, including individuals loosely or directly associated with the Canadian Anti-Hate Network.
 - Volunteered to assist with writing and editing, refusing to take payment or attribution.
 - Wanted to use my platform to circumvent the injunction. She wanted me to produce a podcast highlighting inconsistencies with MOORE FREDERIKSEN’S life story, with the aim of ruining her reputation. (This project never came to fruition.)
 - Displayed an unhealthy emotional dependence on me.

III. BREACH OF NON-COMMUNICATION ORDER

- **Direct Communication:**

- On December 12, 2023, HATEGAN replied directly to me despite being blocked. She circumvented being blocked by posting under another account within a thread.

- **Indirect Communication:**

- Tagged the Law Society of Ontario (LSO) in fifteen tweets with false and salacious accusations against me, despite acknowledging she cannot or should not file a formal complaint while her charges are pending. HATEGAN is aware that I have previously been required to respond to an LSO complaint based on tweets tagging the regulator.
- Tagged my professional contacts, including LISA LAFLAMME, DEAN BLUNDELL, and CRIER MEDIA, in five tweets hoping they will address her allegations with me. Prior to her arrest, she communicated with BLUNDELL via direct message on X, trying to get him to contact me on her behalf. BLUNDELL has reached out to discuss the substance of her allegations.
- On May 7, 2024, after my footage of the University of Toronto's People's Circle for Palestine encampment went viral, she visited the campus and spread false rumours and salacious rumours to another journalist, DAVID MENZIES. On May 8, 2024, MENZIES informed me that she threatened to retaliate once her charges are dropped. This was conveyed as, "She said you should know she will get you back." I have been anxious about reporting at the encampment since her attendance.
- On May 20, 2024, CATHERINE CROCKETT posted on Mastodon about HATEGAN seeking out GISELA MCKAY at the University of Toronto's People's Circle for Palestine encampment. Both CROCKETT and MCKAY are perpetual protesters who HATEGAN knows have been harassing me since July 2021. MCKAY has rallied encampment protesters to accost me and my partner with signs that repeat HATEGAN'S salacious conspiracy theories about us.

IV. ONGOING CRIMINAL HARASSMENT

- HATEGAN responded to being charged with criminal harassment by spreading lies and half-truths to manipulate others and sway public opinion against me. This itself is harassment, especially considering her belief in the [power of words](#):

A lifetime ago, I stood on a stage, a 17-year-old girl barely tall enough to see over the podium, and made skinheads cheer with hate. At age 30, I stood on another stage and read a poem that made an audience weep. Such is the power of words – they can either uplift or uproot lives, plant seeds of hope or hate into others. Words don't just wield power – they are power.

- **Misrepresentation and False Allegations:**
 - Exaggerates her influence on me.
 - Claims ownership of my project that she was invited to join.
 - Claims I owe her money.
 - Accuses me of lying to police and filing a false report.
 - Blames me for her old name appearing on charging documents.
 - Claims conspiracy with the crown and police.
 - Accuses me of spoofing her phone number.
 - Accuses me of inciting others to defame her.
 - Accuses me of malicious wellness checks.
 - Accuses my partner of intercepting my communications.
 - Accuses my partner of running an anonymous account.
- **Obsessive, Manipulative, and Threatening Behaviour:**
 - Describes me as a “lifeline.”
 - Admits she slept with her phone next to her pillow in case I called.
 - Tracks my social media activity, including deleted reviews and retweets.
 - Posts photos and videos imitating my actions or locations.
 - Publishes private conversations and documents and threatens to release more.
 - Hints at lengthy affidavits to expose my personal information.
 - Posts cryptic, intimidating messages targeting me and my partner.
 - Fabricates conspiracy theories to portray me as conspiring with police and the Crown, and my partner as an abusive pimp.
- **Use of Third Parties:**
 - Shared my mother’s home address with JOHN THIBEAU and is working with him to try and identify my partner, who they wrongly believe is named ADAM WATSON.
 - THIBEAU is the subject of multiple RCMP police reports in Yarmouth, Nova Scotia for criminal harassment against me and other women (24-178867, 23-381749, 23-264996, 23-522411, 23-175182).

- Shared partial DMs with DEANA SHERIF, as well as a twelve-year-old article which has been misrepresented online to falsely suggest that I am antisemitic.
 - I represent CHRIS DACEY in a peace bond application and criminal charges against SHERIF.
 - SHERIF is currently in custody awaiting trial on nine charges related to her protest activities, including assault police with the intent to prevent an arrest, assault with a weapon, and hate-motivated harassment by threatening conduct.
- Shared partial DMs with JENNIFER EVANS, which have been published online to falsely suggest that I engage in stalking and harassment.
 - I am suing EVANS in Small Claims Court for defamation.
 - I have reported EVANS for intimidation of justice system participants arising from her commentary following SHERIF's arrest and an assault against DACEY that appears to be retaliatory.
- **Harassment of Third Parties:**
 - Targets my client MARYANN WATSON, who made a police report about HATEGAN'S suicide threats and harassing behaviour prior to HATEGAN being criminally charged.
 - Posts references to her former address and is searching for current address.
 - Sends threatening messages to her family.
 - There were concerns that HATEGAN would crash the recent funeral of WATSON'S Holocaust survivor mother-in-law, who endured five work camps including Auschwitz. WATSON'S name was not included in the obituary as a precaution.
 - HATEGAN has access to Jewish directories through her conversion and speaking gigs at synagogues.
 - It is unclear how HATEGAN connected WATSON to this matter, and whether her contact information was disclosed by York Regional Police.

V. CONCLUSION

Since being arrested, HATEGAN posted approximately 138 derogatory tweets that refer directly or indirectly to me, my partner, and/or my clients, including direct communication (one tweet) and indirect communication (approximately 20 tweets). See Appendix A for a breakdown of themes. HATEGAN also showed up at a location where I was known to be working and sought out third parties for the purpose of disparaging me. One individual subsequently conveyed her message to me.

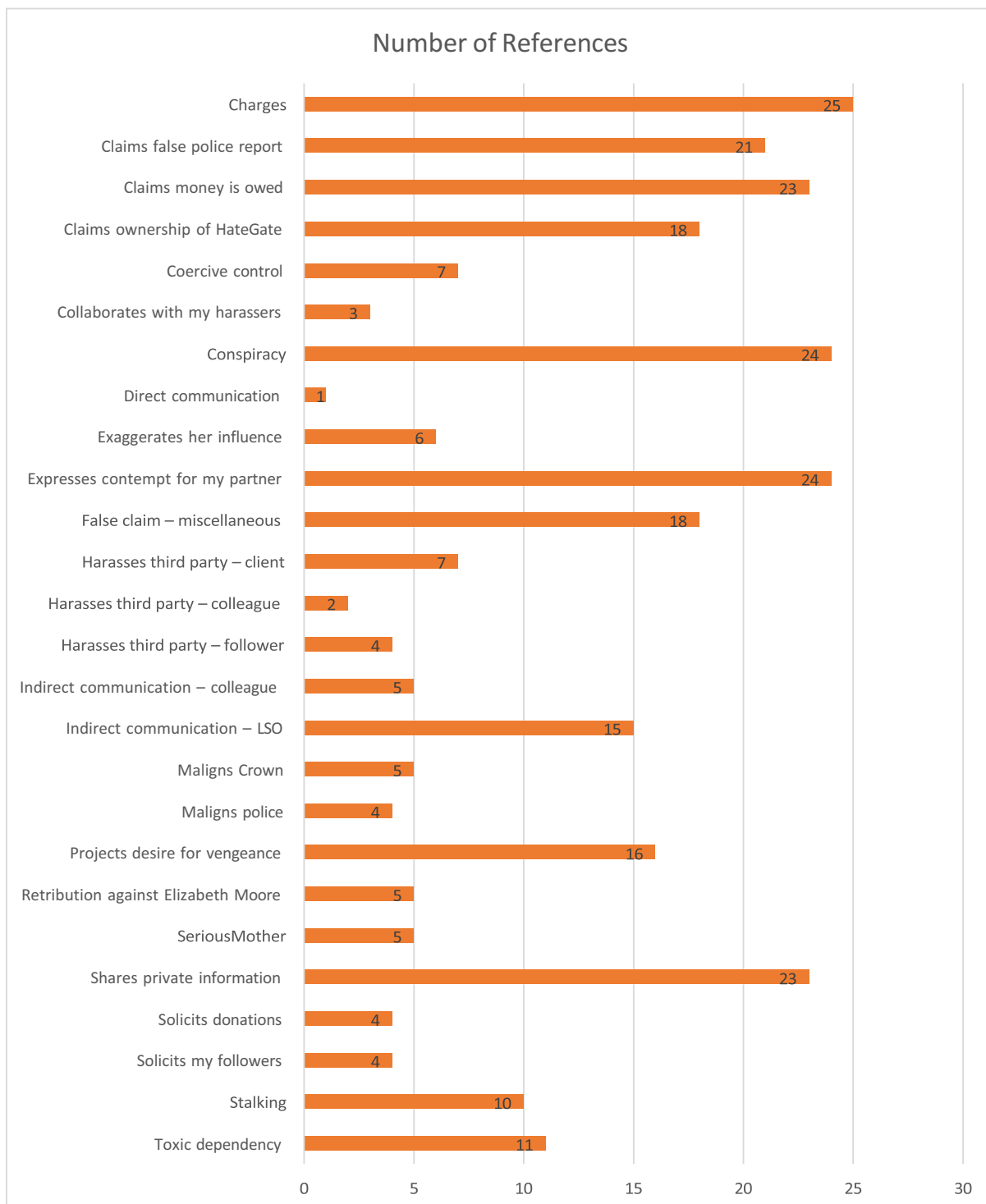
HATEGAN fits the profile of a stalker with severe personality disorders. She demonstrates an exaggerated feeling of self-worth and an obsessive desire for other people to admire and revere her. She also exhibits extreme dependence in her need for constant help, attention, and acceptance from others, as well as a high sensitivity to rejection and abandonment. Her pattern of behaviour includes hyper intimacy, cyber stalking, surveillance, harassment and intimidation, and coercion and threats. I genuinely fear she may escalate to physical aggression.¹

The impact of HATEGAN's stalking has caused me significant anxiety, distress, and a sense of powerlessness. Her attacks have disrupted my personal and professional life. Her collaboration with other online harassers involves disseminating my mother's address and targeting one of my clients. She is actively fabricating conspiracies that put me and my partner at risk of physical harm at protests. I also carry a lot of stress about third parties being harassed by HATEGAN due to their actual or perceived proximity to me, including my client whose name was omitted from her mother-in-law's obituary to minimize risk of the funeral being crashed.

The severity of ongoing harassment highlights the need for additional charges, as well as conditions not to frequent anywhere I work, live, or am known to be.

¹ Crim, J. (2024, March 1). *Stalking. What is the psychology behind the stalker?* THE BEHAVIOUR INSTITUTE. <https://thebehaviourinstitute.com/stalking-what-is-the-psychology-behind-the-stalker/>

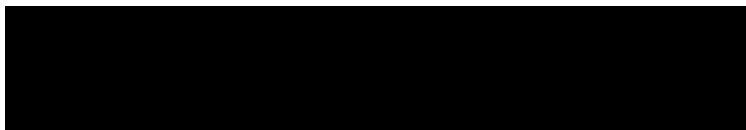
APPENDIX A:



From: [REDACTED]
To: [Diana Vigna](#)
Subject: R v Hategan
Date: Wednesday June 19, 2024 17:42:32

Dear D.C. Vigna,

Please see the latest from Elisa Hategan:



These posts constitute ongoing harassment against me.

Please note there is no back-and-forth social exchange between us whatsoever, whether direct or indirect. I have not publicly responded to any false allegations or harassment. In fact, this is my only post about Elisa Hategan since permanently ceasing contact on or about October 2, 2024:



On Tuesday, June 18, 2024, Caryma Sa'd [REDACTED] wrote:

Dear D.C. Vigna,

I am following up because Elisa Hategan persists in obsessively posting about me on social media.

Her latest post suggests that I tried getting police to kill her and/or provoking her into suicide. She includes a list of cherry picked messages from me to her. She presents as a jilted lover.

This must be considered in the broader context of Elisa Hategan's online activity. **For someone to be charged with criminal harassment to continue unabated with a vicious public attack campaign against the target makes a mockery out of the justice system.** Her posts are designed to incite others and deprive me from having any peace of mind.

Elisa Hategan has participated in extremist (neo-Nazi) behaviour from an early age, and she was trained in harassment techniques by a CSIS operative. She specializes in manipulating others to do her bidding— I know because she tried influencing me to go after Elizabeth Moore on countless occasions. As her current object of fixation, I find myself living in a constant state of fear and anxiety.

Police intervention is the only form of recourse available to make this stop. Please let me know what additional information is required to consider laying additional charges, including breach of recognizance or defamatory libel.

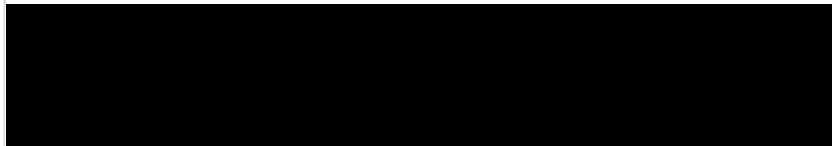
Yours very truly,

Caryma Sa'd

On Wed, Jun 5, 2024 at 4:18 PM Caryma Sa'd [REDACTED] > wrote:
Dear D.C. Vigna,

I am advised that you are back on shift tomorrow evening.

Elisa Hategan has just engaged in more indirect communication, this time by tagging an employer (Legal Professionals Education Network) and my professional regulator (Law Society of Ontario). The tweets include partial and misleading screenshots from our private messages or DMs:



The materials sent on May 28, 2024, should help clarify the scope of Elisa Hategan's ongoing harassment and breach of conditions.

Additionally, I had to file two separate yet connected police reports in April and May about Josh Chernofsky (24-812268) and Gisela McKay (24-1203674), both of whom are actively spreading Elisa Hategan's conspiracy theories on top of the issues complained of in my reports. **The group of people targeting me both individually and collectively are escalating their attacks.** One of my clients was recently jumped and robbed by masked strangers connected to the protest circuit, and I am terrified the same is about to happen to me.

Can I please book a time to visit the station ASAP? I would like to take you through the supplementary evidence specific to Elisa Hategan and connect it to the broader network of harassment. I need support from TPS to enforce the law and protect my safety, including by issuing cautions and/or laying charges (including the possibility of defamatory libel, s. 298 Criminal Code).

I am available at your earliest convenience. My life is pretty much on hold due to the constant state of fear.

Yours very truly,

On Tue, May 28, 2024 at 12:15 PM Caryma Sa'd [REDACTED] > wrote:
Dear D.C. Vigna,

Please find attached information for your consideration with respect to Elisa Hategan's ongoing criminal harassment .

I apologize for the delay in getting this to you. As you can see, there has been a lot of activity since her arrest on December 10, 2023. It took a major physical and emotional toll to go through her feed and categorize the range of attacks against me. I cannot emphasize enough how terrifying it is to be the object of fixation for a former confidante who is now hell bent on ruining my life.

The summary is meant to be read first. The chart of tweets is for a deeper dive, with each row corresponding to a file name in the folder of tweets.

Here is the folder of tweets:

[REDACTED]
[REDACTED]

Do not hesitate to contact me if you have any questions or concerns.

Yours very truly,

--

Caryma Sa'd

Lawyer and Notary Public

[REDACTED]
[REDACTED]

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--

Caryma Sa'd

Lawyer and Notary Public

[REDACTED]
[REDACTED]

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--

Caryma Sa'd

Lawyer and Notary Public

[REDACTED]
[REDACTED]

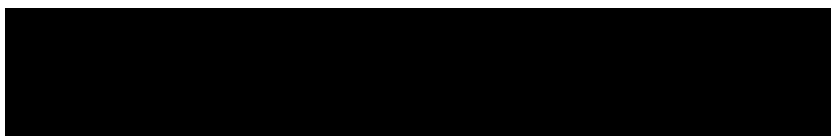
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From: [REDACTED]
To: [Diana Vigna](#)
Subject: Re: R v Hategan
Date: Wednesday June 5, 2024 16:19:31

Dear D.C. Vigna,

I am advised that you are back on shift tomorrow evening.

Elisa Hategan has just engaged in more indirect communication, this time by tagging an employer (Legal Professionals Education Network) and my professional regulator (Law Society of Ontario). The tweets include partial and misleading screenshots from our private messages or DMs:



The materials sent on May 28, 2024, should help clarify the scope of Elisa Hategan's ongoing harassment and breach of conditions.

Additionally, I had to file two separate yet connected police reports in April and May about Josh Chernofsky (24-812268) and Gisela McKay (24-1203674), both of whom are actively spreading Elisa Hategan's conspiracy theories on top of the issues complained of in my reports. **The group of people targeting me both individually and collectively are escalating their attacks.** One of my clients was recently jumped and robbed by masked strangers connected to the protest circuit, and I am terrified the same is about to happen to me.

Can I please book a time to visit the station ASAP? I would like to take you through the supplementary evidence specific to Elisa Hategan and connect it to the broader network of harassment. I need support from TPS to enforce the law and protect my safety, including by issuing cautions and/or laying charges (including the possibility of defamatory libel, s. 298 Criminal Code).

I am available at your earliest convenience. My life is pretty much on hold due to the constant state of fear.

Yours very truly,

On Tue, May 28, 2024 at 12:15 PM Caryma Sa'd [REDACTED] > wrote:

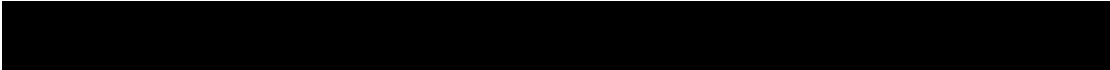
Dear D.C. Vigna,

Please find attached information for your consideration with respect to Elisa Hategan's ongoing criminal harassment .

I apologize for the delay in getting this to you. As you can see, there has been a lot of activity since her arrest on December 10, 2023. It took a major physical and emotional toll to go through her feed and categorize the range of attacks against me. I cannot emphasize enough how terrifying it is to be the object of fixation for a former confidante who is now hell bent on ruining my life.

The summary is meant to be read first. The chart of tweets is for a deeper dive, with each row corresponding to a file name in the folder of tweets.

Here is the folder of tweets:



Do not hesitate to contact me if you have any questions or concerns.

Yours very truly,

--

Caryma Sa'd

Lawyer and Notary Public



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--

Caryma Sa'd

Lawyer and Notary Public



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From: [REDACTED]
To: [Diana Vigna](#)
Subject: Re: R v Hategan
Date: Tuesday June 18, 2024 16:48:04

Dear D.C. Vigna,

I am following up because Elisa Hategan persists in obsessively posting about me on social media.

Her latest post suggests that I tried getting police to kill her and/or provoking her into suicide. She includes a list of cherry picked messages from me to her. She presents as a jilted lover.

This must be considered in the broader context of Elisa Hategan's online activity. **For someone to be charged with criminal harassment to continue unabated with a vicious public attack campaign against the target makes a mockery out of the justice system.** Her posts are designed to incite others and deprive me from having any peace of mind.

Elisa Hategan has participated in extremist (neo-Nazi) behaviour from an early age, and she was trained in harassment techniques by a CSIS operative. She specializes in manipulating others to do her bidding— I know because she tried influencing me to go after Elizabeth Moore on countless occasions. As her current object of fixation, I find myself living in a constant state of fear and anxiety.

Police intervention is the only form of recourse available to make this stop. Please let me know what additional information is required to consider laying additional charges, including breach of recognizance or defamatory libel.

Yours very truly,

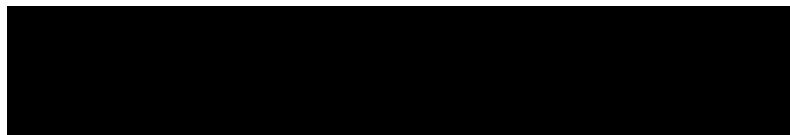
Caryma Sa'd

On Wed, Jun 5, 2024 at 4:18 PM Caryma Sa'd <[REDACTED]> wrote:

Dear D.C. Vigna,

I am advised that you are back on shift tomorrow evening.

Elisa Hategan has just engaged in more indirect communication, this time by tagging an employer (Legal Professionals Education Network) and my professional regulator (Law Society of Ontario). The tweets include partial and misleading screenshots from our private messages or DMs:



The materials sent on May 28, 2024, should help clarify the scope of Elisa Hategan's ongoing harassment and breach of conditions.

Additionally, I had to file two separate yet connected police reports in April and May about Josh Chernofsky (24-812268) and Gisela McKay (24-1203674), both of whom are actively spreading Elisa Hategan's conspiracy theories on top of the issues complained of in my reports. **The group of people targeting me both individually and collectively are escalating their attacks.** One of my clients was recently jumped and robbed by masked strangers connected to the protest circuit, and I am terrified the same is about to happen to me.

Can I please book a time to visit the station ASAP? I would like to take you through the supplementary evidence specific to Elisa Hategan and connect it to the broader network of harassment. I need support from TPS to enforce the law and protect my safety, including by issuing cautions and/or laying charges (including the possibility of defamatory libel, s. 298 Criminal Code).

I am available at your earliest convenience. My life is pretty much on hold due to the constant state of fear.

Yours very truly,

On Tue, May 28, 2024 at 12:15 PM Caryma Sa'd [REDACTED] > wrote:

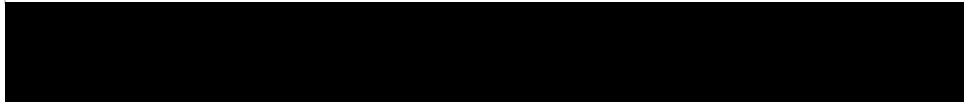
Dear D.C. Vigna,

Please find attached information for your consideration with respect to Elisa Hategan's ongoing criminal harassment .

I apologize for the delay in getting this to you. As you can see, there has been a lot of activity since her arrest on December 10, 2023. It took a major physical and emotional toll to go through her feed and categorize the range of attacks against me. I cannot emphasize enough how terrifying it is to be the object of fixation for a former confidante who is now hell bent on ruining my life.

The summary is meant to be read first. The chart of tweets is for a deeper dive, with each row corresponding to a file name in the folder of tweets.

Here is the folder of tweets:



Do not hesitate to contact me if you have any questions or concerns.

Yours very truly,

--

Caryma Sa'd

Lawyer and Notary Public



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--

Caryma Sa'd

Lawyer and Notary Public

[REDACTED]
[REDACTED]

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Sacha Beaulac

From: Giovanni Di Tommaso
Sent: Monday December 11, 2023 00:12
To: Sacha Beaulac
Subject: FW: 23-2842128

From: Caryma Sa'd <[REDACTED]>
Sent: Monday December 11, 2023 00:09
To: Giovanni Di Tommaso <[REDACTED]>
Subject: Re: 23-2842128

Sorry, missed the link:

[REDACTED]

On Sun, Dec 10, 2023 at 11:57 PM Caryma Sa'd [REDACTED] wrote:

[REDACTED]

Please note that the tweet identified by Ms. Hategan as “30”, she attributes blame to me for her being charged under her former name “Elisse Hategan.” At no point in my communications with police have I referred to her with that name.

Here is the thread posted online:

Caryma Sa'd
Lawyer and Notary Public

[REDACTED]

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From: [REDACTED]
To: [Diana Vigna](#)
Subject: R v Hategan
Date: Tuesday May 28, 2024 12:17:15
Attachments: [REDACTED]

Dear D.C. Vigna,

Please find attached information for your consideration with respect to Elisa Hategan's ongoing criminal harassment .

I apologize for the delay in getting this to you. As you can see, there has been a lot of activity since her arrest on December 10, 2023. It took a major physical and emotional toll to go through her feed and categorize the range of attacks against me. I cannot emphasize enough how terrifying it is to be the object of fixation for a former confidante who is now hell bent on ruining my life.

The summary is meant to be read first. The chart of tweets is for a deeper dive, with each row corresponding to a file name in the folder of tweets.

Here is the folder of tweets:

[REDACTED]

Do not hesitate to contact me if you have any questions or concerns.

Yours very truly,

--

Caryma Sa'd

Lawyer and Notary Public

[REDACTED]
[REDACTED]

***Confidentiality Statement** | The contents of this e-mail, including any attachment(s), are intended for the exclusive use of the recipient and may contain confidential or privileged information. If you are not the intended recipient, you are strictly prohibited from reading, using, disclosing, copying, or distributing this e-mail or any of its contents. If you received this e-mail in error, please notify the sender by reply e-mail immediately and permanently delete this e-mail and its attachments, along with any copies thereof. Thank you.*

TAB 6

Adam Lee WASSERMAN (DOB 12/20/1979)
CRIMINAL HISTORY

[illegible]

Case # 909-01-030014-000 Date opened 05/06/2006
2 charges:
- 26A.121(a) Uttering threats to cause death or
bodily harm (x1), 26A.127(b) Summary (x1)
- 210 Peace Bond
Plea: Not Guilty
Decision: Acquitted of charges, 1 year peace bond.

[illegible]

Case# 000-01-00008-010 Date opened: 04/05/2001
 2 charges:
 - 204 Criminal Homicide, 204 (2)(b) Indecent
 - 800 Peace Bond
 \$4000(2000): In custody and under arrest
 Plea: Not guilty
 Decision: Released with a 12 month Peace Bond

[illegible]

Case # 580 - 418275-008 Date opened: 09/12/2003
2 charges:
- 001 (a) Assault with a weapon or causing bodily harm
- 004 (a) Theft under 3a (a) summary
09/12/03: Arrest warrant issued
28/02/2004: Remanded
15/12/2004: Bail hearing
Plea: not guilty

[illegible]

Case # 200-01-00000-000 Date opened: 03/02/2008
+ 264.0000/Offering Results to select death or bodily harm to any
person, 264.0000 Summary
03/02/2008 Arrest Warrant Issued
26/06/2017 Withdrawn
26/06/2017 Release (Arrest Warrant)

TAB 7



Toronto Police Service

40 College Street, Toronto, Ontario, Canada. M5G 2J3
(416) 808-2222 FAX (416) 808-8202
Website: www.TorontoPolice.on.ca



Office of the Chief of Police

File Number:

July 10 _____, 2025

Sent via email

Elisa Romero Hategan


Dear Elisa Romero Hategan:

Re: Your request for information

I am responding to your request for access to information, our file number 25-1350.

The *Municipal Freedom of Information and Protection of Privacy Act* (the *Act*) defines personal information as that which refers to recorded information about an identifiable individual. Access to such information is strictly controlled by section 14 of the *Act* and subject to specific exemptions. As such, the involvement of any individual (other than yourself) concerning your request cannot be corroborated without written approval from the identified party.

Pursuant to your communication with our office, partial access is granted to information concerning your request, as held by **this Police Service**. Access is denied to certain information pursuant to subsections 8(1)(l), 8(2)(a), 8(2)(c), 12, 14(1)(f), 14(3)(b), 38(a) and 38(b) of the *Act*.


Please be advised that the matter related to Police Report 2024-1616524 is currently still being investigated. Furthermore, sections 8(1)(a) and 8(1)(b) of the *Act* precludes the dissemination of any information prior to the conclusion of a police investigation. Access is therefore denied to this report at this time; however, you may re-submit your request upon the conclusion of this matter. Any concerns regarding these matters should be directed to the officer-in-charge, DC Tyutyunnik #65988 of 52 Division at (416) 808-5200.

These subsections apply because:

FOI TPS.pdf

Open in Documents

Done



TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY
GOW TP 2023-2312409
HARASSMENT - CRIMINAL

Narrative: SUPPLEMENTARY - GO - 1

Subject: FOLLOW UP

Author: 12198 REINDERS, FREDERIK

Related date/time: Saturday, 2023-Oct-14 04:21

Exemptions Applied
14(1), 14(30),
28(3)

On Saturday, October 14, 2023 officers were dispatched on a Harassment call (75-2381215) to [REDACTED] in the city of Toronto. The call text indicated this was related to a previously reported Harassment which culminated in a police caution to both parties to cease communication with each other. [REDACTED] - case record "harassment"

Officers met with [REDACTED] in her office and she stated that after an initial police report on 23/10/24, she had received further communication from HATEGAN via Twitter and email. She showed a detailed chart with a timeline of events and a collection of tweets and emails HATEGAN has sent. The files will be attached to this case.

No threats of bodily harm were made, however threats of information disclosure and public release were seen to have continued since the report date. [REDACTED]

[REDACTED] left the building with officers and departed on a scooter by herself at 0155hrs Saturday morning.

D/C VIGANA was emailed with the updated information.

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

FOI TPS.pdf

Open in Documents

Done



TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY
GOW TP 2023-2312409
HARASSMENT - CRIMINAL

Narrative: CITIZEN INTERNET CRIME REPORT - 1

Author: 65493 PILKEY, DIANA

Related date/time: Tuesday, 2023-Oct-10 08:00

Exemptions Applied
14(1), 14(30),
28(3)

For: 86315 Printed On: Tuesday, 2025-Apr-08 Page 15

*** CONFIDENTIAL ***

From IP Address: [REDACTED]

Elisa Hategan continues to communicate directly with me on social media, despite the issuance of a caution. She has made at least four posts either naming me or tagging me, and has commented within one of my threads by replying to a third party. She continues to fixate on my partner and portrays him in a false, negative light. Her tone ranges from desperate to demanding. I have not unblocked Mr. Hategan at any point. She is naming and tagging me even though I have made it clear that I wish to be left alone. I am concerned that she is ignoring the caution issued by police.

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

FOI TPS.pdf

Open in Documents

Done



TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY
GOW TP 2023-2312409
HARASSMENT - CRIMINAL

Narrative: SUPPLEMENTARY - GO - 1

Subject: FOLLOW UP

Author: 12198 REINDERS, FREDERIK

Related date/time: Saturday, 2023-Oct-14 04:21

Exemptions Applied
14(1), 14(30),
28(3)

On Saturday, October 14, 2023 officers were dispatched on a Harassment call (75-2381215) to [REDACTED] in the city of Toronto. The call text indicated this was related to a previously reported Harassment which culminated in a police caution to both parties to cease communication with each other.

Officers met with [REDACTED] in her office and she stated that after an initial police report on 23/10/24, she had received further communication from HATEGAN via Twitter and email. She showed a detailed chart with a timeline of events and a collection of tweets and emails HATEGAN has sent. The files will be attached to this case.

No threats of bodily harm were made, however threats of information disclosure and public release were seen to have continued since the report date. [REDACTED]

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FOI TPS.pdf

Open in Documents

Done



TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY
GOW TP 2023-2312409
HARASSMENT - CRIMINAL

Narrative: CITIZEN INTERNET CRIME REPORT - 1

Author: 65493 PILKEY, DIANA

Related date/time: Tuesday, 2023-Oct-10 08:00

Exemptions Applied
14(1), 14(30),
28(3)

For: 86315 Printed On: Tuesday, 2025-Apr-08 Page 15

*** CONFIDENTIAL ***

From IP Address: [REDACTED]

Elisa Hategan continues to communicate directly with me on social media, despite the issuance of a caution. She has made at least four posts either naming me or tagging me, and has commented within one of my threads by replying to a third party. She continues to fixate on my partner and portrays him in a false, negative light. Her tone ranges from desperate to demanding. I have not unblocked Mr. Hategan at any point. She is naming and tagging me even though I have made it clear that I wish to be left alone. I am concerned that she is ignoring the caution issued by police.

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

Exemption 28 - Discouraging my release of this information that poses a law enforcement risk

**TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY**

GO# TP 2023-2608706

HARASSMENT - CRIMINAL

Narrative: INITIAL OFFICER REPORT - 2

Subject: GO #23-2312449 - INITIAL OFFICER REPORT

Author: 12073 PIKE, CHRISTOPHER

Related date/time: Wednesday, 2023-Oct-04 16:15

Exemptions Applied:
14(1)(f), 14(3)(b),
38(b)*****BACKGROUND*****

[REDACTED] and Elisa HATEGAN (1974.12.17) have been friends since July 2021.

In July 2022, [REDACTED] and HATEGAN became closer friends over "trauma bonding" and began to work together in creating writing pieces. [REDACTED] and HATEGAN have never been in a physical or intimate relationship.

HATEGAN experiences suicidal ideation, and resulted in a Threaten Suicide call where York Regional Police attended her address (Referenced in TPS GO# 23-2289886 and YRPS GO # 23-342977). When YRPS attended HATEGAN'S address, she stated she was not suicidal and did not have any means. However, HATEGAN expressed her thoughts on MAID which stands for Medical Assistance in Dying when it becomes legal in 2024.

*****SYNOPSIS*****CARYMA LIE - SHE NEVER TOLD ME SHE "NO LONGER WANTED
COMMUNICATION BETWEEN [US]"

On Wednesday, October 04th, 2023 at 14:13 hours, PC PIKE #12073 and PC YU #12210 attended [REDACTED] in regards to an Intimate Partner Incident radio call.

On scene, officers spoke with [REDACTED] and received clarification that the relationship she has with HATEGAN was never physical nor intimate and was strongly bonded through their own previous trauma.

[REDACTED] advised officers that after a falling out, [REDACTED] emailed HATEGAN stating she no longer wanted communication between them and no longer wanted to work with her.

[REDACTED] stated and provided Tweets that HATEGAN posted about [REDACTED] specifically naming her as well as indirectly speaking about her. The posts were posted by handle @elisahategan that belongs to HATEGAN. The posts were speaking about [REDACTED] work and relationship with her male partner. HATEGAN Tweets about how she wrote most of "Hategate" and how [REDACTED] was not being transparent with donations and royalties. HATEGAN was also posting Tweets that has screenshots of text messages between [REDACTED] and HATEGAN with [REDACTED] photo and name as the contact receipt in the screenshot. The post was a work related discussion.

[REDACTED] she is a "public image" and could be subject to harassment and assaults.

Upon further investigation, officers found there was no direct threats or reasonable concern for safety. [REDACTED] was advised to track and report if the situation escalates.

*****NOTIFICATIONS*****

Sgt BLACK #9561 advised.

***** CONFIDENTIAL *****

**TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY**

GO# TP 2023-2608706

HARASSMENT - CRIMINAL

Narrative: INITIAL OFFICER REPORT - 1

Subject: INITIAL OFFICER REPORT

Author: 11439 IVANOV, NIKITA

Related date/time: Friday, 2023-Nov-10 19:43

Exemptions Applied:
14(1)(f), 14(3)(b),
38(b)**BACKGROUND**

The complainant in this investigation is [REDACTED]. She is an investigative journalist who works out of her office located at [REDACTED].

The person of interest is Elisse HATEGAN (1974-12-17). [REDACTED] and HATEGAN had a professional relationship with each other. In July 2022, [REDACTED] and HATEGAN became closer friends over "trauma bonding" and began to work together in creating writing pieces.

SYNOPSIS

On October 14, 2023 at approximately 01:15hrs officers attended [REDACTED] in a relation to a harassment radio call.

Officers arrived on scene and spoke with the complainant whom advised of the following information:

She said that on October 4, 2023 [REDACTED] made a report of a criminal harassment to Toronto Police Service (23-2312449).

Officers later learned that investigation was cleared by a way of caution.

CARYMA LIE - I WAS NEVER "CAUTIONED"

[REDACTED] told officer that the caution did not work and she continued to receive emails from HATEGAN, was being tagged to twitter posts. HATEGAN was also posting twitter posts that were either directly and indirectly related to her.

[REDACTED] HATEGAN's behaviour puts a target on [REDACTED] back because of current geopolitical conflict in middle east. This is because [REDACTED] is of Palestinian decend and HATEGAN is of Jewish decend.

[REDACTED] said that she did not know what HATEGAN is capable of and she did not mention any direct threats made to her from HATEGAN.

Timeline of the posts directed at [REDACTED] will be attached to the report as well as screenshots of emails and tweets.

CARYMA LIE - TELLING POLICE I AM A THREAT TO HER BECAUSE I AM JEWISH

D/C FRANCIS #11541 was notified

*** CONFIDENTIAL ***

**TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY**

GO# TP 2023-2608706

HARASSMENT - CRIMINAL

Narrative: PROSECUTION SUMMARY - 1

Subject: PROSECUTION SUMMARY

Related Entity: ROMERO HATEGAN, ELISA ISABELLA (ARR-CHARGE #1)

Author: 7755 UMBRELLO, FRANCO

Related date/time: Tuesday, 2023-Nov-14 22:36

Exemptions Applied:
14(1)(f), 14(3)(b),
38(b)

ACCUSED: Elisa Isabella Sophia ROMERO HATEGAN (1974/12/17)

CHARGE: CC 264 (2) (b) HARASSMENT BY REPEATED COMMUNICATION WITH PERSON

DATE: On and between September 30th 2023 to November 14th 2023

LOCATION: [REDACTED], city of Toronto

COMPLAINANT: [REDACTED]

CARYMA LIES

1. There was no "falling out" - her boyfriend Adam Lee Wasserman seized control of our communications, initially against her will, and blocked me. In his Oct. 7, 2023 Substack blog, he admitted that he gave her an ultimatum: choose him or me.
2. Caryma NEVER told me that "she no longer wanted communication between [us]".

BACKGROUND

The complainant, [REDACTED], is an investigative journalist who works out of her office located at [REDACTED], in the City of Toronto.

The accused Elisse HATEGAN has had a professional relationship with the complainant and began to work together in creating writing pieces. However, there was a falling out between both parties and the complainant stating to the accused that she no longer wanted communication between them and no longer wanted to work with her.

SYNOPSIS FOR A GUILTY PLEA

On September 30th 2023, due to the falling out of their professional relationship the complainant had blocked the accused from her cell phone and media accounts as the accused had posted disparaging remarks about her.

On and between September 30th 2023 to November 14th 2023, the accused continued to try and communicate with the complainant through social media and numerous e-mails, even after being told by the complainant on multiple occasions that all communication was unwanted. Due to all the repeated communications and the accused dismissing the complainant's demands to stop, [REDACTED] (CHARGE).

On Sunday December 10th, 2023, the accused turned herself in to 14 Division and was placed under arrest. She was provided her rights to counsel and released on a Form 10 with conditions.

CARYMA LIES - She never, not ONCE, much less "ON MULTIPLE OCCASIONS" TOLD ME THAT "ALL COMMUNICATION WAS UNWANTED".

I WAS CRIMINALLY CHARGED ON CARYMA'S WORD ALONE.

DC Vigna took Caryma's word and failed to verify any of her lies. Vigna argued with me, telling me that she KNEW I had "ignored numerous, multiple warnings and cautions" - and she told me, on VIDEO, that THIS was the reason why I was arrested and charged.

*** CONFIDENTIAL ***



Subject: INITIAL OFFICER REPORT
Author: 82954 DI TOMMASO, GIOVANNI
Related datetime: Monday, 2023-Dec-11 02

Exemptions Applied:
14 CFR, 14.13(b),
38.03

(ATTN: I.E. - living online is **DIFFERENT** from the target's keyword search. **RESEARCHERS** cannot just a pop searching for keywords. I did NOT tell them to just do online on the internet. I got her **DIFFERENT** to a conf' target. Google pointed me to a "target" because it's a research website to **SEARCH**.)

CRIMINAL ID: telling police that I should be charged with criminal harassment and/or a sexual offense
I "WARRANTED" her. Because I spoke openly about her CRIMINALIZED sex. Showing this is not a criminal offense. Harassment is considered intimate's own words consent.

File: BK115 Printed On: Tuesday, 2024-Apr-09

Page 44

128766-110—The relationship NEVER "let up". The boyfriend kicked me & gave me an extremely abusive sex life. The NEVER told me that "she no longer wanted to speak with [me]".

*** CONFIDENTIAL ***

Page 66314 - Printed On: Tuesday, 2024-Aug-06

Page 44



NOTIFICATIONS
D/C BEAGLAC 9326 CIB

Exemptions Applied
14 fully, 54 partly,
2000

File: BK115 Printed On: Tuesday, 2024-Apr-09

	TORONTO POLICE SERVICE GENERAL OCCURRENCE HARD COPY
COM TP 2025-208414	FOI WITH CONDITIONS

Narrative: INITIAL OFFICER REPORT - 1

Subject: INITIAL OFFICER - OCCURRENCE (131212)
Author: 12463 TYBURN, KEEGAN

Related date/time: Tuesday, 2025-Dec-02 12:58

QOP 23-2458434

DATE and TIME: Tuesday December 12 2023, 2113 hrs

LOCATION: [REDACTED]

BACKGROUND

The complainant, [REDACTED] is an investigative journalist who works out of her office located at [REDACTED].

The suspect is Elise HATEGAN (1974-12-17). [REDACTED] and HATEGAN had a professional relationship with each other. In July 2022, [REDACTED] and HATEGAN became closer friends over "trauma bonding" and began to work together in creating writing pieces.

However, there was a falling out between both parties and the complainant stating to the accused that she no longer wanted communication between them and no longer wanted to work with her. [REDACTED] NEVER TOLD ANY ONE "NO LONGER WANTED COMMUNICATION"

HATEGAN was arrested on Sunday December 10th, 2023, when she turned herself in to 14 Division. HATEGAN was placed on a Form 10 with no contact conditions (QOP 2023-2458704).

SYNOPSIS

On Tuesday December 12, 2023, officers responded to a harassment radio call at [REDACTED].

Officers spoke with the complainant, [REDACTED] who stated that she believed Elise HATEGAN had breached her conditions not to communicate with her by posting "tweets" on [REDACTED] Twitter posts. [REDACTED] stated that this behaviour had been ongoing since Sunday December 10, 2023 and provided officers with screen shots of the tweets.

NOTIFICATIONS

DC VIGNA #82088

CARPMA 10-1 NEVER BREACHED MY CONDITIONS

My release condition was not to contact Carpinia directly or indirectly. And to NEVER DO.

Police were not conditions and officers are aware that I was never supposed to see.

CARPMA managed to convince 14 Division Police that despite being behind ME/THAN, BUCHAN, I was still communicating WITH her - rather than ABOUT her.

14 Division police, as usual, failed to conduct an impartial investigation and only believed Carpinia - leading to my second charge, of "breaching" a condition I never breached.

*** CONFIDENTIAL ***

For: 86315 Printed On: Tuesday, 2025-Apr-08

Page 11

	TORONTO POLICE SERVICE GENERAL OCCURRENCE HARD COPY
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*****SYNOPSIS*****

On Sunday, December 10, 2023, officers DI TORRADO #2950 and BRUK 11929 were dispatched to a radio call for a Check Address at [REDACTED].

Information in the text of the call advised that [REDACTED] wished to report that HATEGAN had breached her conditions of release by sending confidential information to a third party who had been posting it online. [REDACTED] of going online to her friends to see if they were posting it online. [REDACTED] of this condition. [REDACTED] of this condition.

Officers attended the scene and spoke with [REDACTED]. She advised officers of the following information:

At 22:45 hrs, HATEGAN had made several posts on X (formerly Twitter), recounting her relationship with [REDACTED], and slandering her reputation by claiming that [REDACTED] had been engaging in discreditable conduct in her profession as a journalist. Several other third parties had gained access to private message conversations between [REDACTED] and HATEGAN, which could only be accessed by HATEGAN and [REDACTED].

Officers advised [REDACTED] that the matter would be investigated further, but that she should consider pursuing this matter in civil court as defamation.

CARPMA 10-1 "BREACHING" condition to not a "PERSONAL OFFENSE"
CARPMA DEMANDS ONE - THAT IS DISCREDITABLE CONDUCT

*** CONFIDENTIAL ***

For: 86315 Printed On: Tuesday, 2025-Apr-08


Page 12

	TORONTO POLICE SERVICE GENERAL OCCURRENCE HARD COPY
COM TP 2025-208414	FOI WITH CONDITIONS

[REDACTED] provided officers with screenshots of HATEGAN's 2 posts, which will be attached to the case.

*****NOTIFICATIONS*****

D/C BEAULAC 9326 C18

	TORONTO POLICE SERVICE GENERAL OCCURRENCE HARDCOPY GOM TP 2025-209414	ETC WITH CONDITIONS
---	---	---------------------

Narrative: PROSECUTION SUMMARY - I

Subject: **PROSECUTION SUMMARY**
Related Entity: **ROMERO HATEGAN, ELISA ISABELLA (ARR-CHARGE #1)**
Author: **7759 UMBRELLA, FRANCO**
Related date/time: **Tuesday, 2024-Jun-25 20:17**

Exemptions Applied:
14(1), 14(2),
28(b)

ACCUSED: Elisa Isabella Sophie ROMERO HATEGAN (1974/12/17)
CHARGE: CC 143 (b) (4) **FAIL TO COMPLY WITH UNDERTAKING**
DATE: December 10th 2023 - June 18th 2024
LOCATION: City of Toronto

COMPLAINANT: [REDACTED]

BACKGROUND

The complainant, [REDACTED], is an investigative journalist who works out of her office located at [REDACTED] in the City of Toronto.

The accused Elisa HATEGAN has had a professional relationship with the complainant and began to work together in creating writing pieces. However, there was a falling out between both parties and the complainant stating to the accused that she no longer wanted communication between them and no longer wanted to work with her.

COURT ORDER

On December 10th 2023, the accused was charged with Harassment By Repeated Communication With Person CC 284(2) (b). The accused was a candidate for a Pym 15 - Undertaking release with conditions. One of the conditions being:

"You must not communicate, directly or indirectly, with [REDACTED], no exceptions"

The accused understood her conditions and understood the criminal consequences of not abiding by them. The accused promised to abide by the conditions and was released on December 10th 2023.

SYNOPSIS FOR A GUILTY PLEA

On December 10th 2023, after the accused being released on an undertaking, at approximately 10:45 pm, the accused, accessed her X (formerly known as Twitter) social media account and had made several posts recounting her relationship with the complainant and slandered her reputation by claiming that complainant had been engaging in disreputable conduct in her profession as a journalist. Several third parties had gained access to private message conversations between them, which could only be accessed by the complainant and the accused.

Furthermore, on December 12th 2023, the complainant, had observed on her X (formerly known as Twitter) social media account that the accused had been posting "replies" to her personal X posts from the accused own X account.

*** CONFIDENTIAL ***

For: 86315 Printed On: Tuesday, 2025-Apr-08

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SYNOPSIS FOR A GUILTY PLEA

On December 10th 2023, after the accused being released on an undertaking, at approximately 10:45 pm, the accused, accessed her X (formerly known as Twitter) social media account and had made several posts recounting her relationship with the complainant and slandered her reputation by claiming that complainant had been engaging in disreputable conduct in her profession as a journalist. Several third parties had gained access to private message conversations between them, which could only be accessed by the complainant and the accused.

Furthermore, on December 12th 2023, the complainant, had observed on her X (formerly known as Twitter) social media account that the accused had been posting "replies" to her personal X posts from the accused own X account.

*** CONFIDENTIAL ***

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	TORONTO POLICE SERVICE GENERAL OCCURRENCE HARDCOPY GOM TP 2025-209414	ETC WITH CONDITIONS
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This form of communication has been continuous from the onset of the accused release, on December 10th 2023, on through with the last posted date on June 18th 2024 (**CHARGE**).

All X posts had been saved as evidence.


On Wednesday June 26th 2024 the accused attended 14 Division - Toronto Police Service, was placed under arrest, provided her rights to counsel and was held pending a show cause hearing.

Caryma Sa'd lies to Toronto police, falsely accusing Elisa Hategan of operating X / Twitter accounts @FOCUSTNV and being connected to @SP411STAR

FOI TPS.pdf

Open in Documents

Don



TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARDCOPY
GOM TP 2024-2249135
FTC WITH CONDITIONS

Narrative: INITIAL OFFICER REPORT - 1
Subject: INITIAL OFFICER REPORT
Author: 11771 MOORE, DANIEL
Related date/time: Monday, 2024-Oct-14 14:35

Exemptions Applied:
14(30), 14(30.1),
35(h)

**** BACKGROUND ****

The complainant, [REDACTED] is an investigative journalist who works out of her office located at [REDACTED], in the City of Toronto.

The suspect, Elisa HATEGAN (1974.12.17), has had a professional relationship with the complainant and began to work together in creating writing pieces. However, there was a falling out between both parties and the complainant stated to the accused that she no longer wanted communication between them and no longer wanted to work with her. During their friendship, the complainant had noticed the accused used the handle, "Dreamer", when she posted on Twitter.

On December 10th, 2023, HATEGAN was arrested and charged with harassment by repeated communication with person. She was released with numerous conditions, including by not limited to, "Do not post anything on social media about [REDACTED]".

On June 26th, 2024, HATEGAN was arrested for failing to comply with her conditions.

**** SYNOPSIS ****

On Monday, October 14th, 2024, the complainant, [REDACTED], called police to report that the suspect, HATEGAN, had breached her conditions again.

[REDACTED] reported the following, during their friendship, [REDACTED] purchased [REDACTED] and used this page for her work and business. During that time, HATEGAN purchased [REDACTED] and told her it was to protect her from an enemy purchasing the URL, and using it against her.

[REDACTED] received a message from a friend directing her to [REDACTED], and asked if she knew about this page. The page contained links to Twitter and other social media pages. The Twitter handle "@SP411Star" has a long history of posting [REDACTED] name and picture all over the page with slanderous messages. The posts also mention "Lee" which is the name of the complainant's videographer, claiming he is a sex trafficker and pedophile. The page mentions the complainant by name "Yelp Reviews for [REDACTED]".

[REDACTED] advised she had a screenshot of the receipt that HATEGAN used to purchase the URL of [REDACTED] and will upload it to the occurrence along with screenshots and screen captures of the posts about herself from @SP411Star and @FOCUSTNV on Twitter.

NOTIFICATIONS
D/C MAZZA 11950

CARYMA LIES
1. I do not own the Twitter accounts @SP411STAR or @FOCUSTNV and do not know who does.
2. The Twitter account @SP411STAR NEVER posted that "Lee" - who Caryma tells police is her "videographer" rather than boyfriend/chosen life partner - is a "sex trafficker and pedophile".

Yet 14 Division Police were prepared to arrest me for a THIRD TIME based on Caryma's word/lies alone.
There was no "impartial investigation" - if I didn't have an expensive lawyer who fought back, I would have been criminally charged a third time.

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THEir WORKING CONDITIONS.

Narrative: PROSECUTION SUMMARY - I

SUBJECT: PROSECUTION SUMMARY *NEEDS TO BE UPDATED UPON ARREST*****

Author: 1999 MCSAAR, JACOB

Related data/you: Wednesday, 2025-Jan-15 11:56

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1401 7th Ave., New York, NY 10019-3901
www.pearsoned.com



ACCUSED: Elise Isabella Sophia ROMERO HATEGAN (1974/12/17)

CHARGE

1 CC 145 (S) (W) FBI. TO COMPLY WITH RELEASE ORDER

2025 RELEASE UNDER E.O. 14176

DATE: August 26th 2024 and November 6th 2024

DATE: August 20th 2024
LOCATION: [redacted]

COMPLAINANT

<http://www.sagepub.com>

The complainant, [REDACTED], is an investigative journalist who works out of her office located at [REDACTED] in the City of Toronto.

The accused Elise HATEGAN has had a professional relationship with the complainant and began to work together in creating writing pieces. However, there was a falling out between both parties and the complainant stating to the accused that she no longer wanted communication between them and no longer wanted to collaborate with her.

The accused owns website [REDACTED] which is a website that was used to assist the complainant with her career.

COUNTY ENGINEER

On June 26th 2024, the accused entered into a release order at the Ontario Court of Justice at 10 Armoury Street by Justice of the Peace J. GREWAL. The accused was released with one of the following conditions:

Do not post anything on social media about

SYNOPSIS OF A GUILTY PLEA

On Monday October 14th 2024, the complainant contacted Toronto police to report the accused breaching her conditions again and is posting messages on social media that directed towards her and mentions the complainant by her name.

The complainant advised police that the accused had purchased the web domain, [REDACTED] in January 2023. The complainant provided officers with photo messages confirming the accused owns the website. The complainant advised no

*** CONFIDENTIAL ***

For: 30.705 Printed On: Tuesday, 2025-Apr-08

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SYNOPSIS OF A GUILTY PLEA

On Monday October 14th 2024, the complainant contacted Toronto police to report the accused breaching her conditions again and is posting messages on social media that directed threats to her and mentions the complainant by her name.

The complainant advised police that the accused had purchased the web domain, [REDACTED] in January 2023. The complainant provided officers with photo messages confirming the accused owns the website. The complainant advised no

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File: 00319 Printed On: Tuesday, 2015-Apr-08

Figure 13



1200 TFP 1614-1109130

ETC WITH CONDITIONS

one else would have ownership of this website, only the accused. The complainant provided officers the photos that were submitted on evidence.com

The account was before the courts on a release order, one of the conditions being "Do not post anything on social media about [REDACTED]". The name of the website is [REDACTED]. On this website there are multiple links to different websites. On this website there is a linktree which shows you to access the X account (formerly known as Twitter) @SP115TAR which contains multiple messages directed towards the complainant and it mentions her by name.

One of the X posts that was posted on August 25th, 2024, states the following, "Folks, always double check your work and verify information from sources or you end up a fallowing hack like [REDACTED] CHARGE #1). On November 8th 2024, @SP411STAR posts the following message, "[REDACTED] name might watermark content, but the [REDACTED] footage is not filtered through [REDACTED] eyes, behind the lens lurks the gaze of King Lear" (CHARGE #2)

On 11/11/11 the accused was placed under arrest for 2 counts of failing to comply with her release order. The accused was read her rights to counsel and transported to 14 Division pending a show cause hearing.

Exemptions Applied
14/10/15, 14/10/15,
14/10/15

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Done



TORONTO POLICE SERVICE
GENERAL OCCURRENCE HARD COPY

GO# TP 2024-2349139

ETC WITH CONDITIONS

Narrative: SUPPLEMENTARY - GO - 1
Subject: INVESTIGATIVE SUPPLEMENT - CONCLUSION
Refused Tanya [REDACTED] (WITNESS #1)
Author: 12089 MCNABB, JACOB
Refused date/time: Friday, 2025-Jan-24 14:49

Exemptions Applied:
14(1), 14(30),
16(1)

SUPPLEMENT

From viewing the investigation from its entirety, I have made the decision that the accused was not breaching her conditions and there is no sufficient evidence or reasonable grounds to proceed with criminal charges for the following reasons of my investigation:

Friday December 27th 2024

I contacted the complainant regarding follow up for the investigation in order to establish a breach from the person of interest Eliza HATEGAN(1876/12/17).

- From evidence.com there were photos added regarding ownership of a website domain, [REDACTED] that was purchased in January 2023 from HATEGAN, it showed messages from HATEGAN and the complainant showing ownership belonging to HATEGAN and her taking responsibility of the operation of the domain.

Tuesday January 14th 2025

- The host domain is operated by GoDaddy, I contacted them and was advised by their customer service that they would not be able to provide me with the information, however they advised that I go through their complaint process and to encourage the complainant to file a complaint as well.
- I advised the complainant to also submit a GoDaddy complaint.
- The complainant submitted a new incident report with GoDaddy and advised by email of new posts that were being uploaded to tarnish her reputation.

Wednesday January 15th 2025

- From viewing the information on evidence.com that was provided to me at the time I was satisfied with reasonable grounds that HATEGAN had breached her release order on two separate occasions, August 2024, and November 2024.
- I contacted HATEGAN's defense lawyer Megan Schwarzenbruber, I advised of the allegations made and for her client HATEGAN to turn herself in to 14 Division.
- I was advised by the 28th of January that her client would turn herself in to 14 Division.

Friday January 24th 2025


- The complainant contacted Toronto Police 14 Division requesting for an update, which at the time there is no update to provide.
- I contact Megan Schwarzenbruber regarding an update on her client turning herself in to 14 Division, I was advised that there was evidence that would incriminate her client that she was not breaching, I agreed to wait at it to maintain an impartial investigation, I did advise though I am willing to accept the evidence, but cautioned MS.Schwarzenbruber, that I did not wish to incriminate her client.
- MS.Schwarzenbruber provided the evidence through email of the following:
 - From the abuse team of GoDaddy, the email advised that the domain of [REDACTED] is no longer registered with them, it was registered with HATEGAN from January 20th 2023 to January 20th 2024.
 - Despite HATEGAN not being an owner of the website domain anymore, I want to ensure that she was not breaching and not operating the website.

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GENERAL OCCURRENCE HARD COPY

GO# TP 2024-2349139

ETC WITH CONDITIONS

- I contacted Toronto Police C3 investigator: D/C HEROUX #7505 regarding how domains work, I was advised that anyone can control a host domain. Regarding the website domain I was advised that HATEGAN would have control of that. Now that the website domain of [REDACTED] was expired, she would not have any control of the website.
- I advised MS.Schwarzenbruber with my findings, and to advise her client that she is not available.

COMPLAINANT NOTIFICATION

Friday January 24th, 2025

- On Friday January 24th, 2025, at 1847 hours, I advised the complainant with my findings and reasoning regarding no breach, occurring [REDACTED] I explained the steps that I took regarding this investigation.
- The complainant was demanding that I write a search warrant regarding HATEGAN's phone and items to access social media, I advised that I need reasonable grounds to proceed with charges and explain why the devices were used in the commission of an offense.

CONCLUSION

- The complainant provided me with information that was uploaded onto evidence.com, including messages from a better account (briener, which she suspects to be HATEGAN, She had advised me that she observed that name on her phone previously, I was not advised of a date or location.
- I did not write a production order for better and other social media accounts because, I don't have the grounds to support that it is HATEGAN at this time, from the messages provided on evidence.com, it could be numerous people, and the posts could have been sent from anyone.
- I advised the complainant to contact Toronto police, if she believes there are any further breaches from HATEGAN, it will be investigated from the beginning and determined if criminal charges are warranted.
- I was not satisfied with everything provided that charges would be warranted at this time.

[REDACTED]


Exemptions Applied:
14(1), 14(30),
16(1), 16(2)

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Done



TORONTO POLICE SERVICE

GENERAL OCCURRENCE HARDCOPY

GD# TP 2025-962308

PRIVATE COMPLAINT INFORMATION

General Occurrence Information

Main offence: PRIVATE COMPLAINT INFORMATION - COMPLETED

Operational status: OPEN / PENDING

Location: TORONTO

Place name: 14 DIVISION

District: 14 Zone: 141 Area: 884

Approved on: Tuesday, 2025-Mar-18 by: 89235 FACIOTTI, MICHAEL

Reported on: Monday, 2025-Mar-18 10:00

Occurred between: Sunday, 2025-Oct-01 10:00 and Friday, 2025-Mar-07 10:00

Submitted by: 88963 BOWEN CARTER, SARAH Org unit: CRT - Ontario Court of Justice Toronto

Lead investigator: 9430 CASEY, JAMES

Exemptions Applied

14(1)(b), 14(3)(a), 28(1)

CCJS Information

CCJS Status: STILL UNDER INVESTIGATION

Offences committed: PRIVATE COMPLAINT INFORMATION - COMPLETED

Location type: POLICE / COURTS (Parole Board, Probation Office)

Related Person(s)

1. SUMMON/104 1 - ROMERO-HATEGAN, ELISA ISABELLA SOPHIA(Case-specific)

FOI TPS.pdf

Open in Documents

Done



TORONTO POLICE SERVICE

GENERAL OCCURRENCE HARDCOPY

GD# TP 2025-962308

PRIVATE COMPLAINT INFORMATION

1 count(s) under CRIMINAL CODE 810

Date: 2025-Oct-01 10:00 To Date: 2025-Mar-07 10:00

Exemptions Applied

14(1)(b), 14(3)(a), 28(1)

Related IDs/Social Media

Email Address: HELP@SAIVOCACY.COM

Master Name Summary

Name: ROMERO HATEGAN, ELISA ISABELLA SOPHIA

TAB 8

March 20, 2024

Re: Subject: Caryma Faye Sa'd
Complainant: Bernie Farber
Case No.: CAS - 135409 - D8PB84

As discussed during our telephone conversation on March 19, 2024, I have completed my investigation of your complaint. For the reasons explained below, I have concluded that your complaint raised concerns that Ms Sa'd has,

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

However, I will be closing this investigation with Regulatory Guidance provided to Ms Sa'd to help avoid similar issues in the future.

Background

In this investigation the evidence revealed that the Lawyer first attended at and identified Jewish retail outlets in a plaza near your home. She then attended your home to serve a Notice on you. At your home she showed a picture of herself on your front lawn and at your front door. These images were all portrayed as tweets on Ms Sa'd's online account on X.

Explanation

The regulatory issues are substantiated by Ms Sa'd's posts on X.

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

Ms Sa'd's actions appear to be opportunistic as the service of a document could have been completed by a process server. However, she chose to share the process in a public forum.

As such, I find that she has 'failed to act with honour and integrity'. There was no need for her to proceed in this way. She should not have turned her issue with the Canadian Anti Hate Network into what appears to be a personal issue with you.

I also find that she has 'engaged in harassing, and/or discriminatory conduct'. While she stated in her post that she stopped at a random plaza, she clearly displayed the names of retail outlets in that plaza, Israel's, Judaica Centre and Sobey's Kosher Market. She wanted to clearly identify the 'Jewishness' of this neighborhood and in turn that you are Jewish. This should never have been displayed by Ms Sa'd.

I also find that she has, 'engaged in conduct that tends to bring discredit upon the legal profession'. Any person who also knows that she is a lawyer, may perceive her actions as inappropriate by a lawyer in the legal profession.

Outcome

After considering all the material and information gathered in the investigation, I have concluded that the investigation identified concerns about Ms Sa'd's conduct and that she,

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

To address these concerns, I have provided Ms Sa'd with Regulatory Guidance. I have referred her to Rule 2.1-1, Rule 6.3.1-1 and Rule 7.3-1 of the *Rules of Professional Conduct*. I have copied the above noted rules into Appendix A at the end of this letter.

I have also explained to the Licensee how this situation could be avoided in the future. As the issues have now been addressed, the Law Society will be taking no further action.

Regulatory Guidance is a remedial response to your complaint, to remind the Licensee of their professional obligations and to assist them in complying with the *Rules of Professional Conduct*. It is not a disciplinary measure, and it is not the practice of the Law Society to make it public. As with all licensees, in the event of future complaints against the Licensee, the Law Society will review their entire regulatory history, including any Remedial Guidance provided, before determining the appropriate outcome.

Complaints Resolution Commissioner

You may request a review of the Law Society's investigation of your complaint or the outcome by the [Complaints Resolution Commissioner](#). A review request must be made to the Office of the Complaints Resolution Commissioner within 60 days of this letter's date.

Thank you for bringing your complaint to the attention of the Law Society, and for your assistance with my investigation. Your participation in the process has supported the Law Society with its mandate to protect the public interest.

Yours truly,



Peter Stehouwer, Investigator

TAB 9

Text Messages from Caryma Sa'd, June 16, 2023



TAB 10



Caryma Sa'd - ...



Follow



@CarymaRules

The civil matters involving Keven Ages and myself have been resolved.

I have posted in detail my views of Mr. Ages's statements and their impact on me. Certain statements I made about Keven and Dawn Ages reflected my opinions, which were not independently confirmed by others, and caused them harm.

I encourage readers to critically assess information they encounter online.

11:11 AM · Jun 23, 2025 · **2,138** Views



Caryma Sa'd



Caryma Sa'd



2d ·



Caryma Sa'd



Just now ·

The civil matters involving Keven Ages and myself have been resolved.

I have posted in detail my views of Mr. Ages's statements and their impact on me. Certain statements I made about Keven and Dawn Ages reflected my opinions, which were not independently confirmed by others, and caused them harm.

I encourage readers to critically assess information they encounter online.



2



Like



Send



Share



Caryma Sa'd



2d ·

The civil matters involving Keven Ages and myself have been resolved.



TAB 11

**Mitch** 🇨🇦

76K posts

Follow

Mitch reposted

**Caryma Sa'd - Lawyer + Politic...**

@Caryma... · Jan 27

Got an unsolicited call from @TorontoPolice Hate Crimes Unit today, which marks the first time cops have reached out proactively to make an arrest based on my footage.

But this spitting incident did not happen in a vacuum, nor was it a random attack.

There is a coordinated,
[Show more](#)


Caryma Sa'd - Lawyer + Politic... @Caryma... · Jan 26


Clearer image of woman who needs to be identified for legal action.

She spat on my Jewish videographer and called

**Mitch** 🇨🇦

76K posts

Follow

Mitch reposted

**Caryma Sa'd - Lawyer + Politic...**

@Caryma... · Jan 27

Got an unsolicited call from @TorontoPolice Hate Crimes Unit today, which marks the first time cops have reached out proactively to make an arrest based on my footage.

But this spitting incident did not happen in a vacuum, nor was it a random attack.

There is a coordinated, ongoing hate campaign intended to limit my participation in the public sphere as a lawyer, journalist, and citizen.

I have been targeted nonstop since 2021, and my family, clients, friends, colleagues, and supporters harassed as proxies; my videographer takes the brunt of abuse.

This spitting situation likely got special attention due to widespread outrage online—the public relations department is perhaps the tail wagging the dog at @TorontoPolice. In fact, I have documented and/or reported countless other crimes with no meaningful follow up.

A meeting is being set up with @TorontoPolice to discuss the underlying harassment, specifically hatred and violence incited against me by Gisela McKay, Elisa Hategan, Josh Chernofsky, Jennifer Evans, Deana Sherif, Joe Morin, Clayton Goodwin, John Thibeau, and Brett Stewart.

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

My case is only the tip of the iceberg.

[#cdnpoli](#) [#ProtestMania](#)



TAB 12



jennifer evans 🇦🇪 🇮🇳 🇨🇦 ✓
@nejsnave

...

a tip on keeping your law license and
avoiding criminal charges - don't suborn
perjury - and don't perjure yourself ...

oh, too late you say? 🙄

the "hilarious" thing is this could be one
of several people 🤔

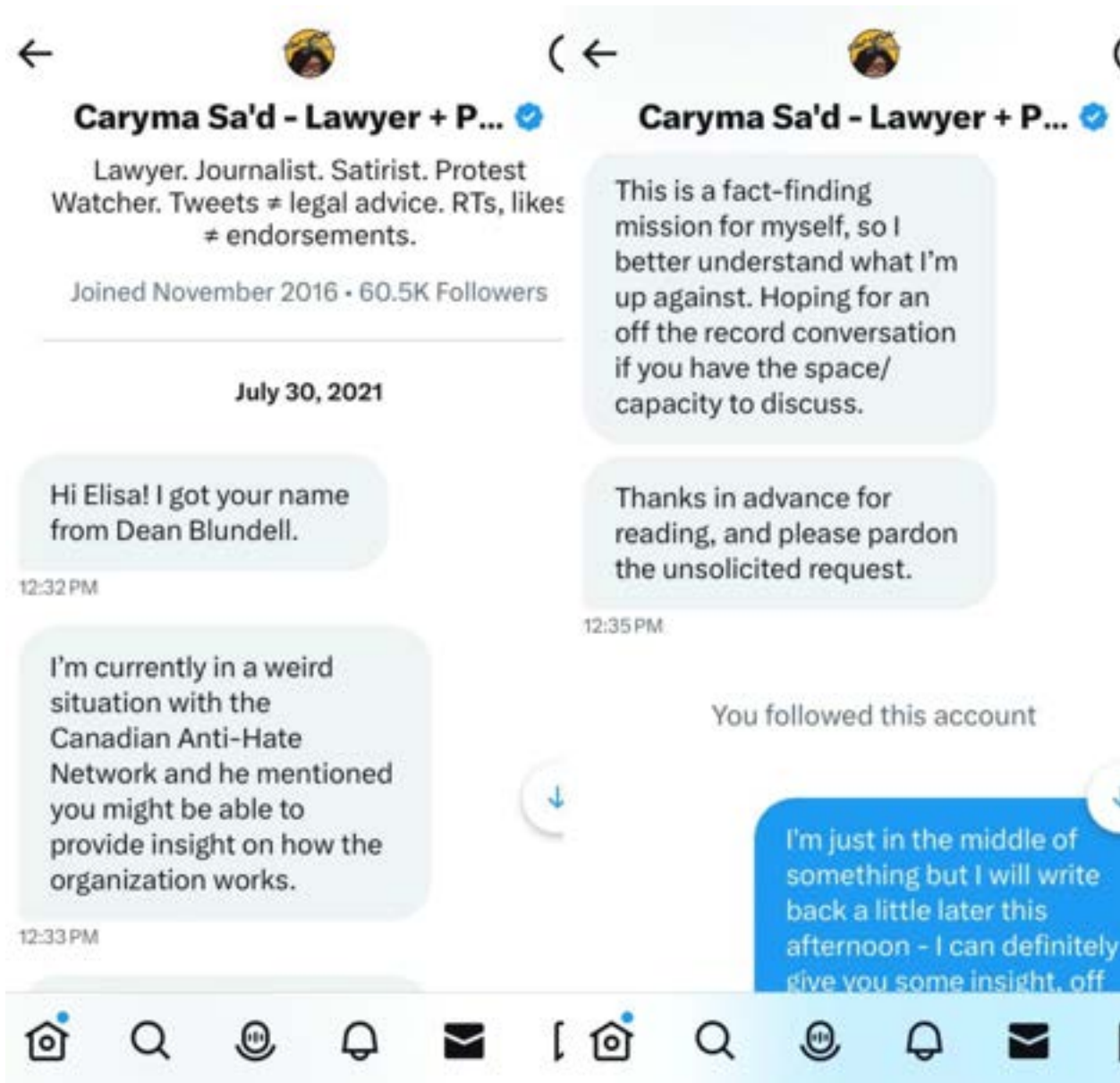
They said they would drop the case
against me if I was willing to testify
against you! LOL. Of course, I turned
them down. They wanted me to say
that you had tricked me into having
the views that I had.

You know what that means tho ... they
have a weak case and they were
looking for more substance.

TAB 13

July 30, 2021 – Caryma Sa'd initiates contact with Elisa Hategan

Beginning in Fall 2023, Sa'd lies to Toronto Police and tells them that Ms. Hategan contacted her first because she wanted to enlist her help in pursuing “revenge” against people she had sued. Text message correspondence clearly shows that Sa'd pursued Hategan in order to extract information about her “enemies” at CAHN, who she herself would later sue – and lose.



Messages from Caryma Sa'd to Elisa Hategan offer assurances that conversations are privileged

APRIL 21, 2022

JULY 20, 2022



2022-11-18



Caryma Sa'd - Lawyer + P...

I understand and don't mean to minimize, I'm so sorry



I just mean that most people don't read case law

Including lots of lawyers

But I've been talking about your case with lawyers over coffee at the conference today



3:54 PM



Caryma Sa'd - Lawyer + P...

Everyone has been shocked about the injunction



3:55 PM

have you really? Now you've got me crying

3:55

Of course. It's a fucked up situation.



3:55 PM

and your day isn't even done yet, and here's a





Caryma >



Anyway, I have to stop crying and shift gears to send Apsimon's bitches that SOD.

This summer we fuck all your enemies up

Legally, cleanly, irrevocably

I could say thank you for giving me hope, but those are just words. Because you know me, you know what this means to me. It's everything, it's life and death for me. So mere words can't really



iMessage



TAB 14



Caryma Sa'd - Lawyer + P... ✓

It's okay I don't want to put you in an awkward position

I think I have found a public admission regardless

5:12 PM

yeah, I definitely don't want to be arrested because of her, because it would push me over the edge - and if I kill myself, they win.



that's the only reason I'm still around, tbh - to spite them

5:13 PM



04-21-2022



Caryma Sa'd - Lawyer + P... ✓

I'm sure they're trying their best to get me arrested, knowing I would kill myself. I don't have a criminal record, but when I was a child I witnessed a lot of trauma with my family and Romania's Securitate (communist Romania's equivalent of KGB), and a lot of other trauma having to do with police and brutality. Hence I have to make the disclaimer about speaking with you only because you are a lawyer.

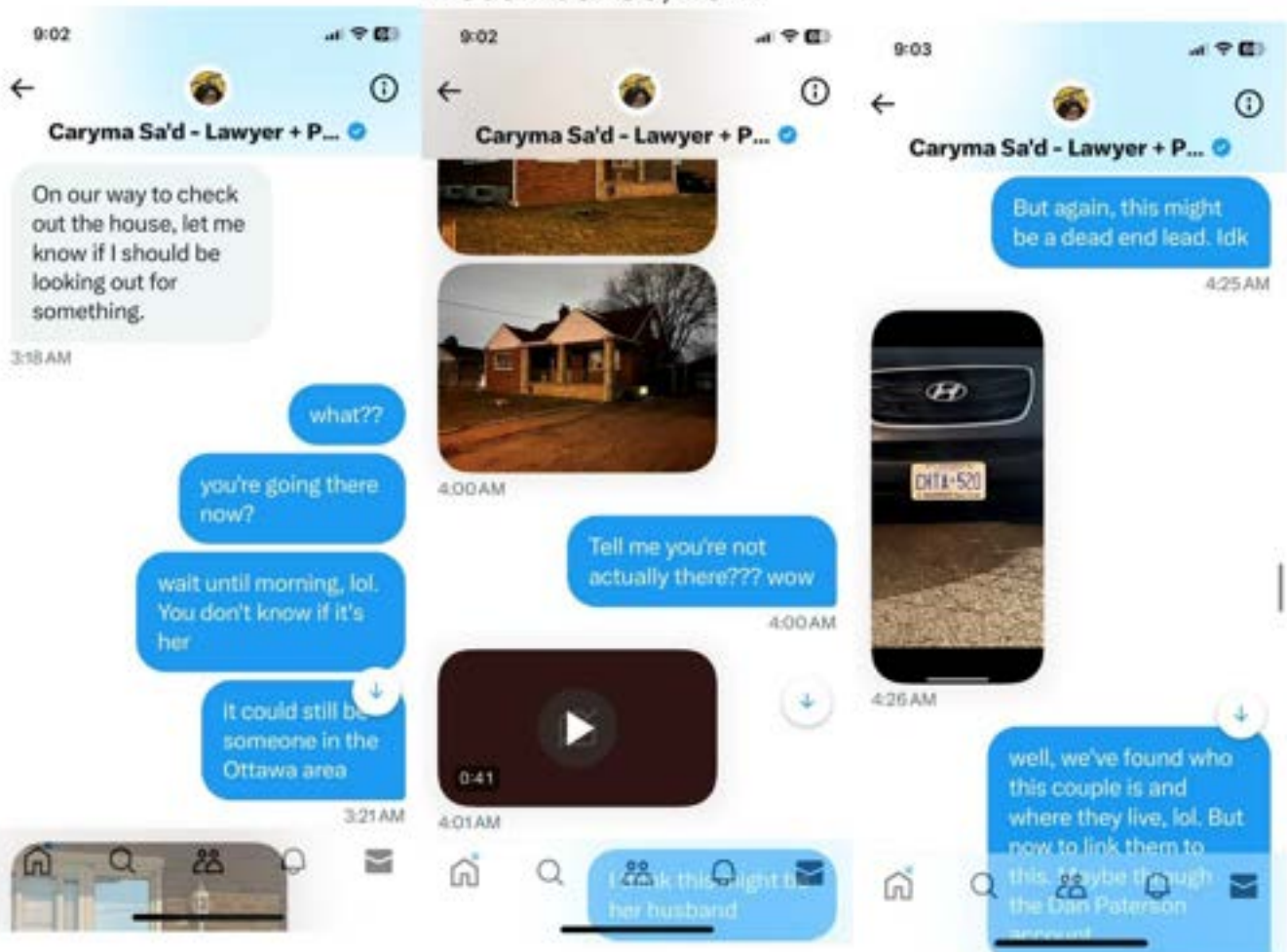


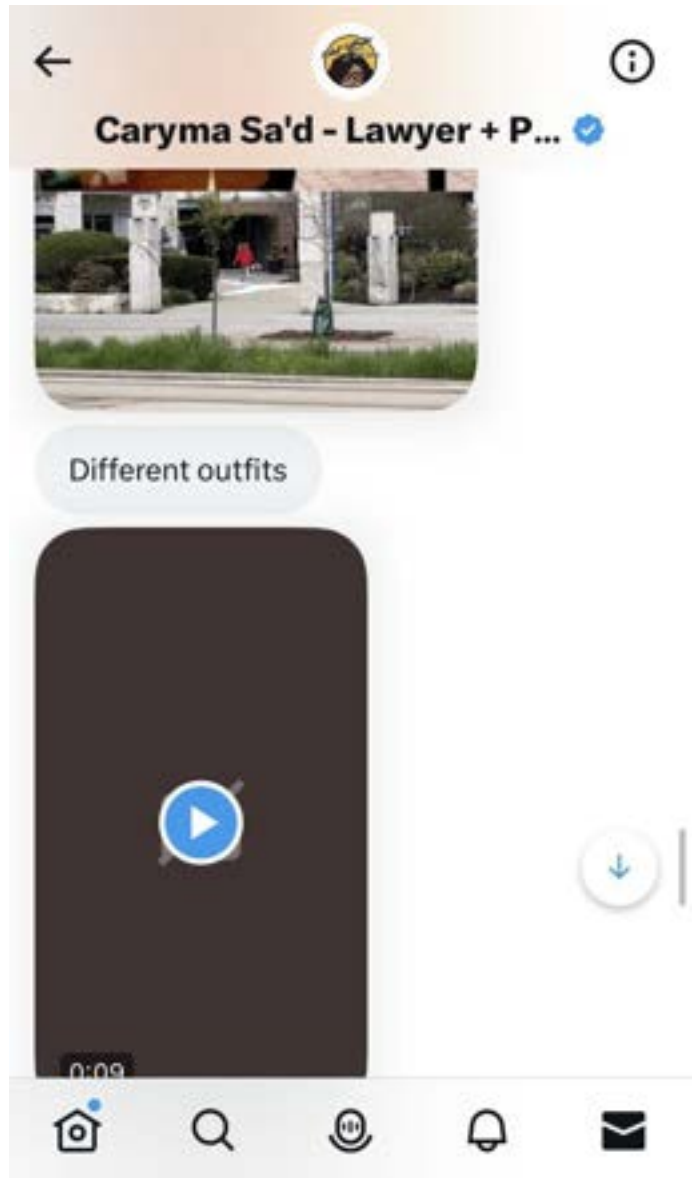
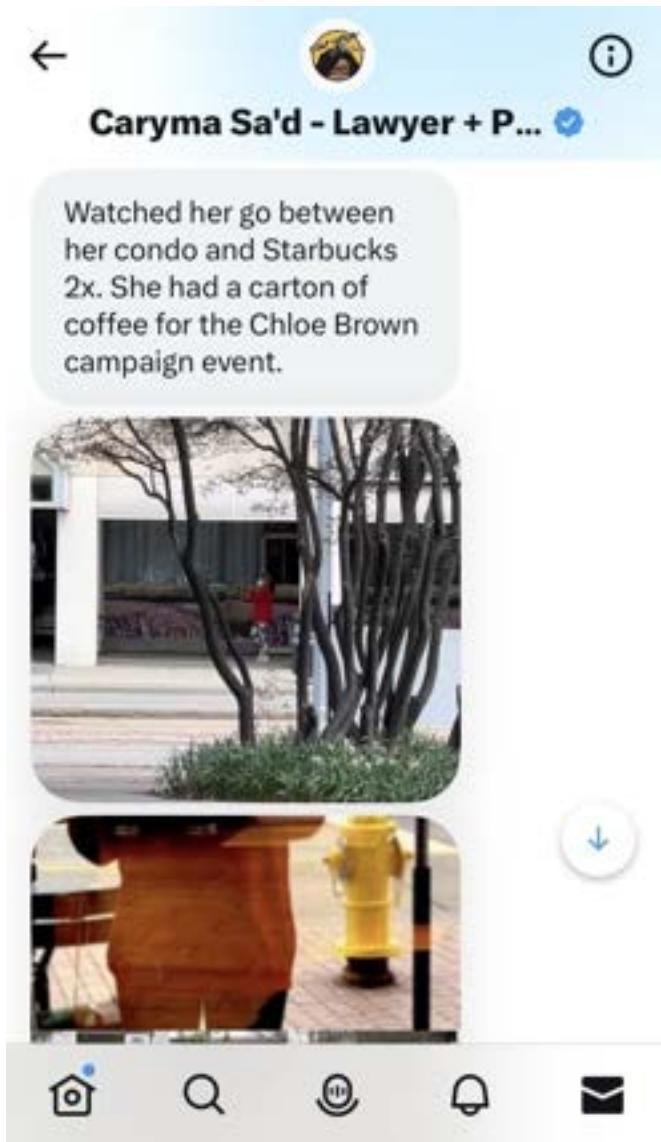
I understand, and as far as I'm concerned these consultations are privileged.



TAB 15

December 30, 2022





VIDEO 1



VIDEO 2



VIDEO 3



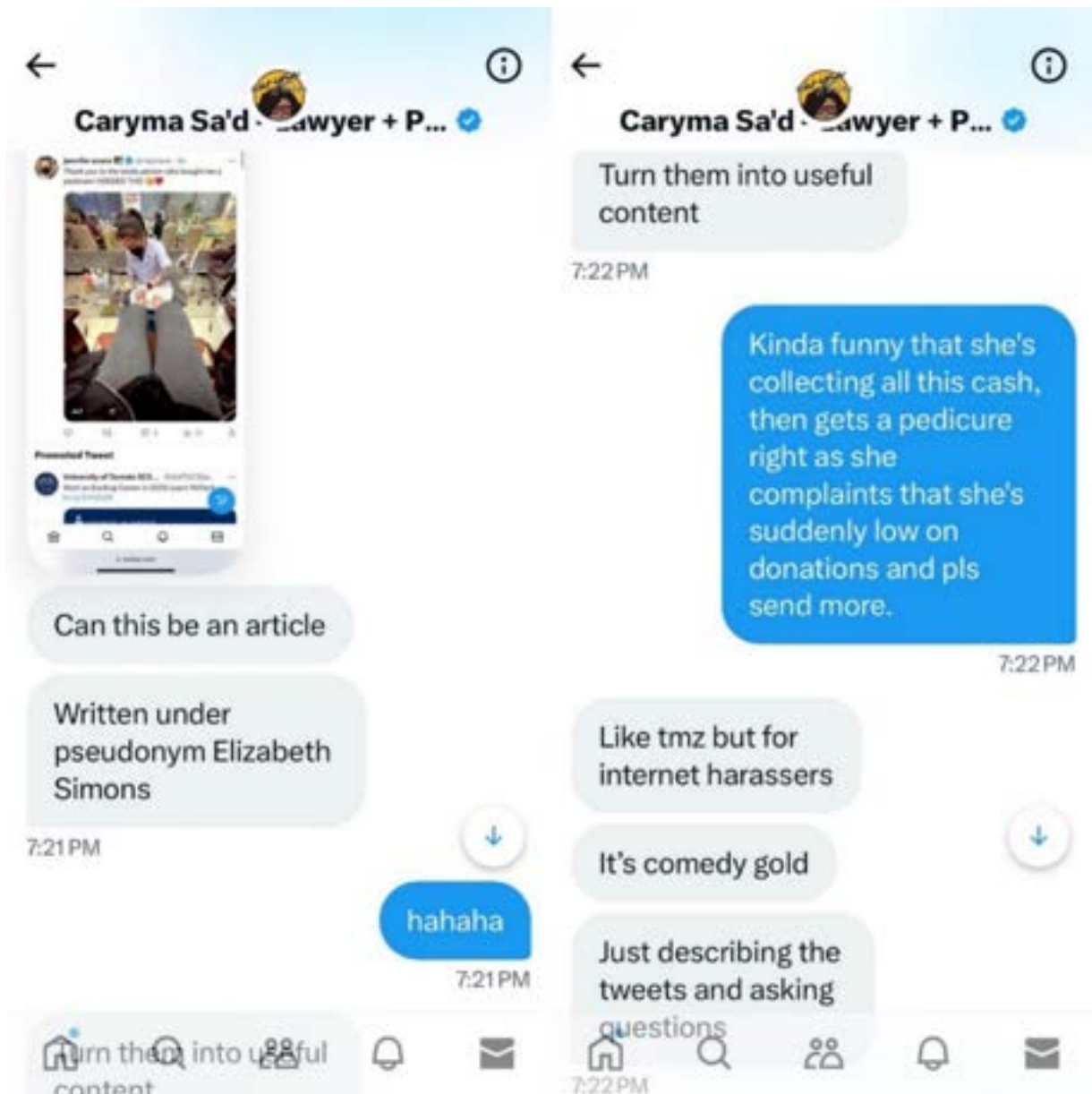
VIDEO 4



Elisa Hategan advising Caryma Sa'd against taking actions that could have legal repercussions



Text Messages from Caryma Sa'd discussing her plan to write a Poison Pen article about Jennifer Evans





Caryma Sa'd - Lawyer + P...

I think it'll be published to Crier under new profile named Elizabeth Simons, and I won't be involved with creating or using that handle.

8:43 PM

Perfection

That's what I was thinking

8:43 PM

Trashy content for a trash person



8:43 PM



not our own platform



Caryma Sa'd - Lawyer + P...

The more enraged she becomes, the more mistakes she'll make

11:42 AM

Oh she's almost too easy to trigger

The text message cease & desist was a test

She failed abysmally



11:43 AM





Caryma Sa'd - Lawyer + P... ✓

kind of activity. Let them investigate her.

But if you write an article about her, it might screw up your legal action

So the article has to be written/published by a third party

8:40 PM

It's small claims, I don't really care

8:41 PM



The good thing about either an article and/or a complaint to some regulatory body, is it would cause donors to lose faith



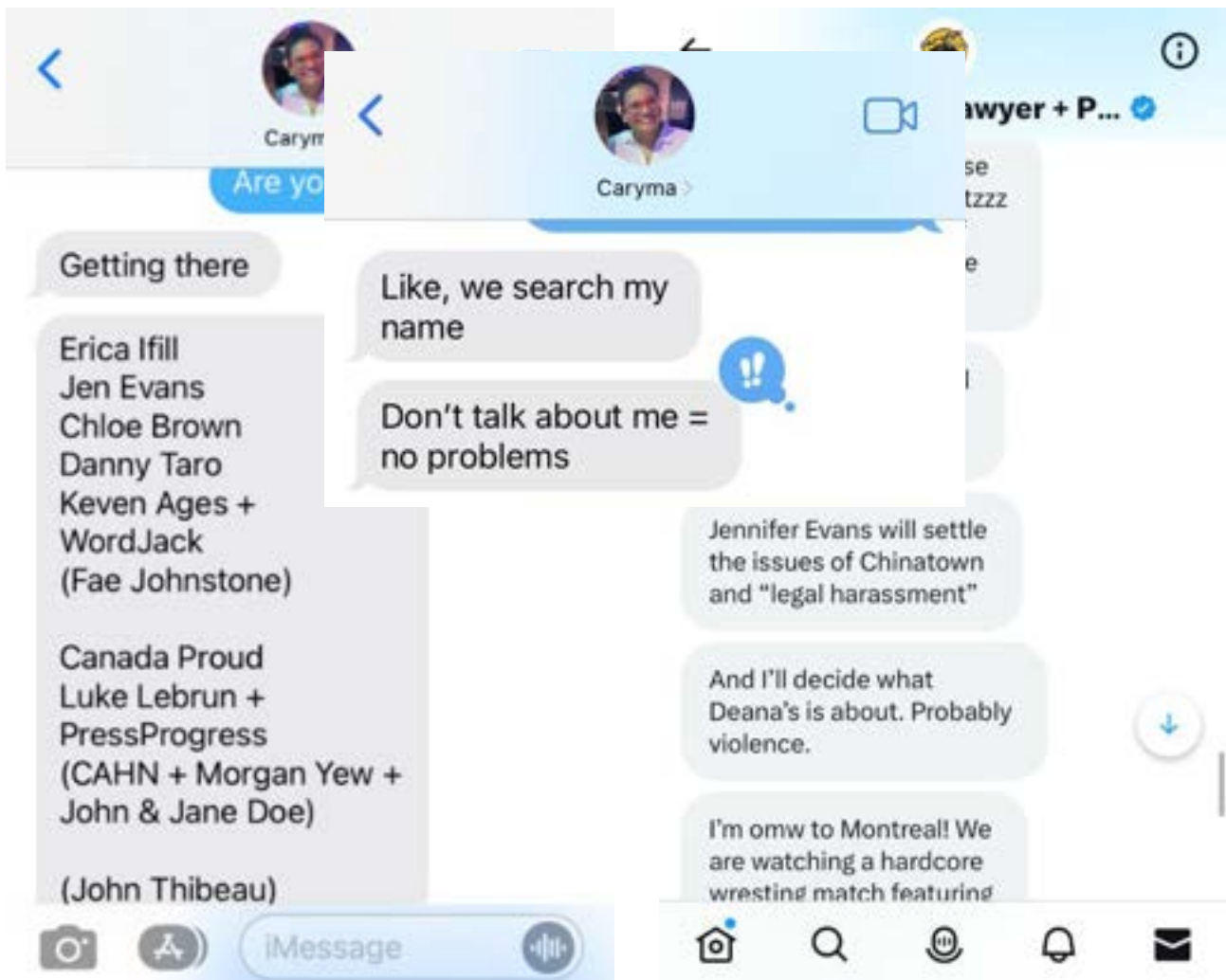
TAB 16

08-24-2023

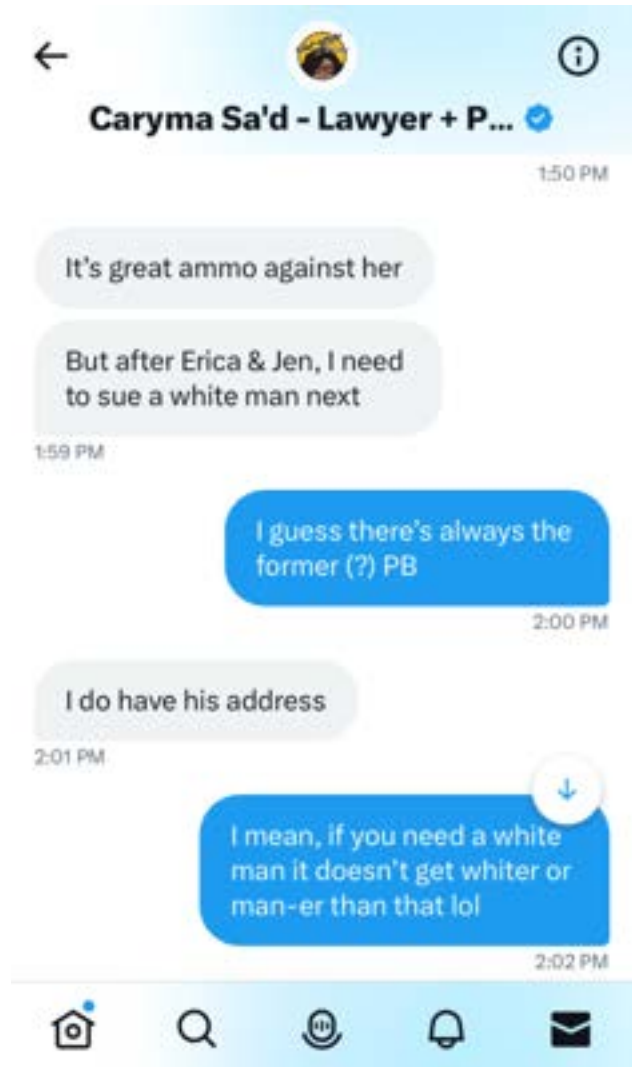


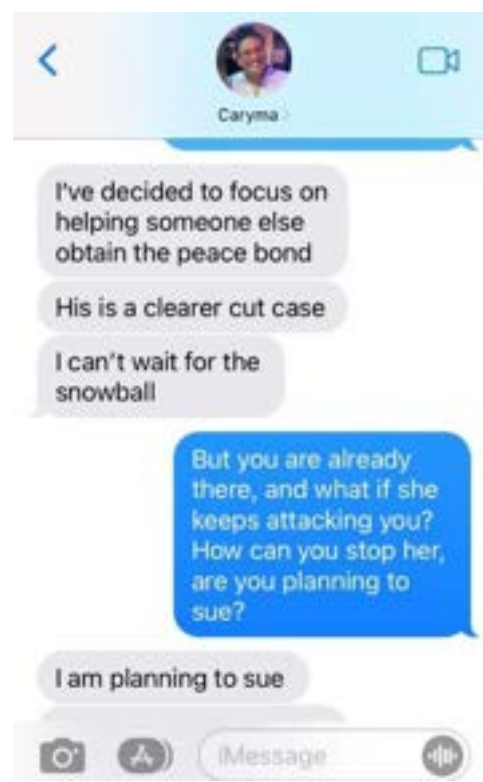
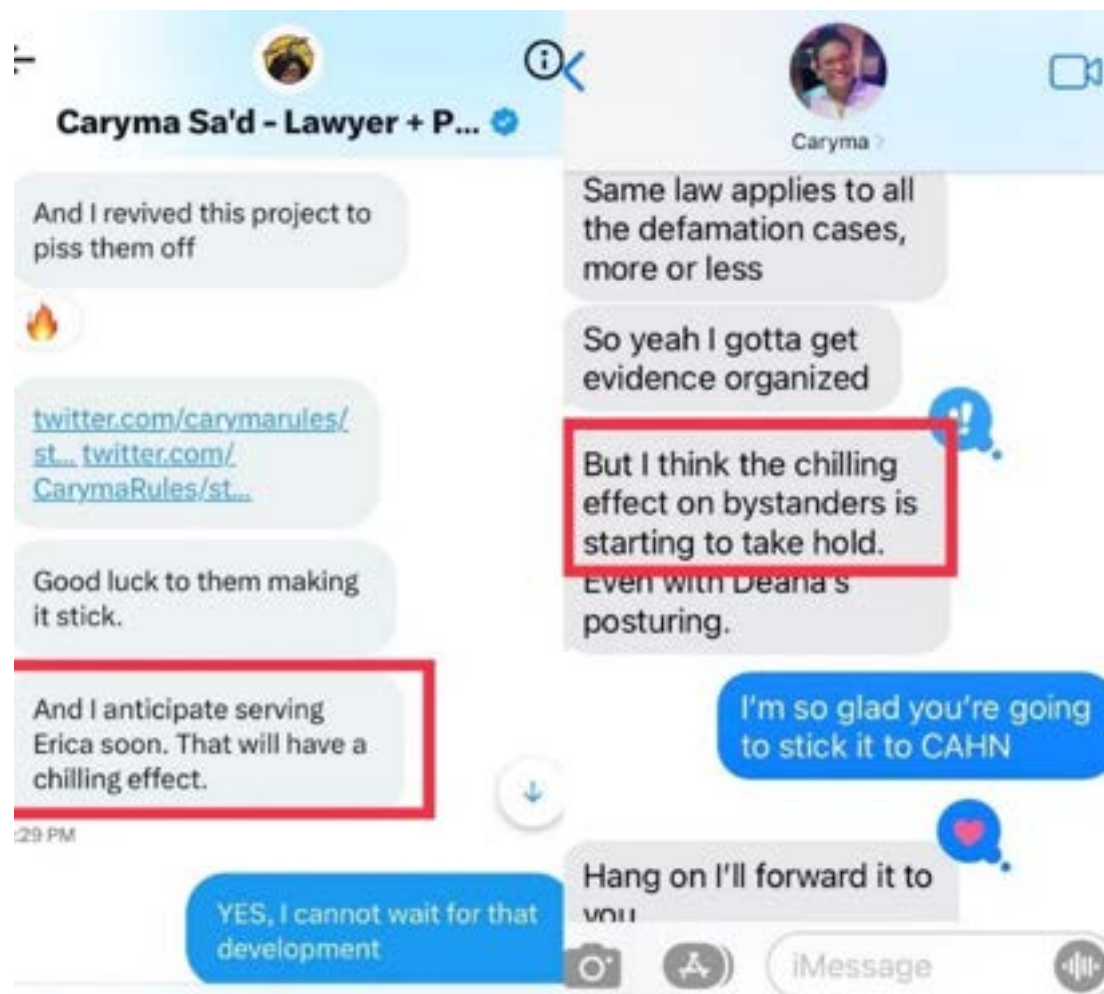
TAB 17

On Lawsuits, Libel Chill and Lawfare

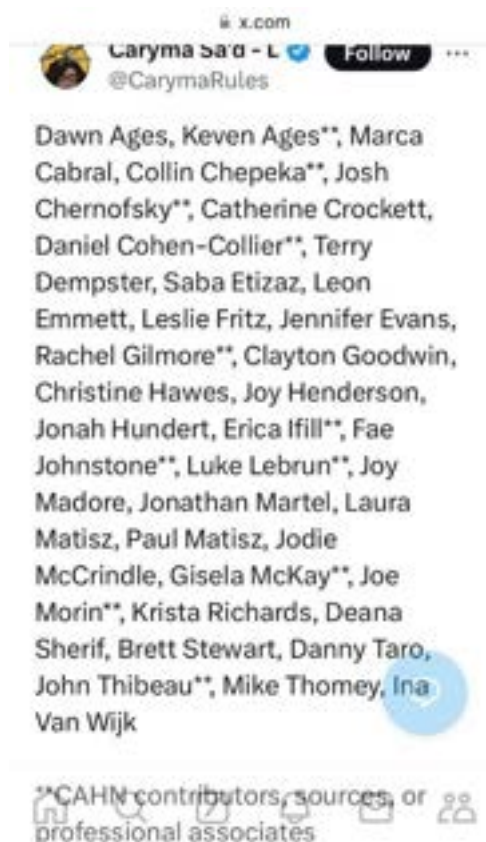


Choosing lawsuits based on race and sex, sometimes with no cause of action





Caryma Sa'd names all these people as "harassers"



A short list in alphabetical order, dating back from July 2021 to present:

Dawn Ages, Keven Ages, Marca Cabral, Collin Chepeka, Josh Chernofsky, Catherine Crockett, Daniel Cohen-Collier, Terry Dempster, Saba Etizaz, Leon Emmett, Leslie Fritz, Jennifer Evans, Rachel Gilmore, Clayton Goodwin, Christine Hawes, Joy Henderson, Jonah Hundert, Erica Ifill, Fae Johnstone, Luke Lebrun, Joy Madore, Jonathan Martel, Laura Matisz, Paul Matisz, Jodie McCrindle, Gisela McKay, Joe Morin, Krista Richards, Deana Sherif, Brett Stewart, Danny Taro, John Thibeau, Mike Thomey, Ina Van Wijk



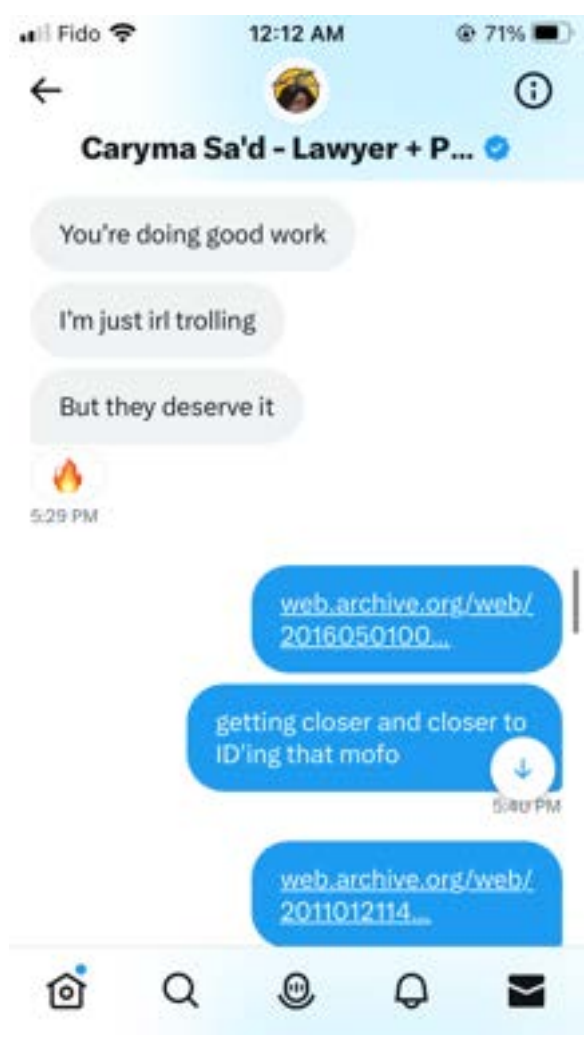
TAB 18

Sa'd frightens critics, while reporting them to police as "criminal harassers" and claiming they make her fear for her safety



8-27-2023





3:31

63



Caryma Sa'd - Lawyer + P... ✓

You're right about
quitting at the apex

But also bear in mind
what we were talking
about yesterday

12:49 PM

I'm also a bit crazy.
And this is the closest I
will ever get to being a
wrestling heel. Part of
me (more than I will
ever admit publicly) is
having a blast, even
though it's IRL
negativity rather than
kayfabe.



But you are sensible,
and honestly the past
two weeks have been




TAB 19

Organizing a letter-writing campaign to a critic's workplace (for the second time) to get him fired



TAB 20



Caryma Sa'd - Lawyer + P... 

The paralysis keeps setting
in

Plus undiagnosed ADHD,
plus sense of doom, plus
existential threats



4:55 PM

TAB 21

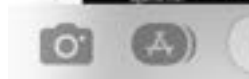


1 Reply

Now I have to run to a dr appt and hope to turn my R prescription into an A. Let's hope for the best.

Praying for your drug upgrade

Fri, Jul 7, 2:50 PM



I'm gonna book a doctors appointment

9:29 PM

Did the stuff I left with you work?

Go to your old family dr

9:30 PM

I didn't notice a major change tbh

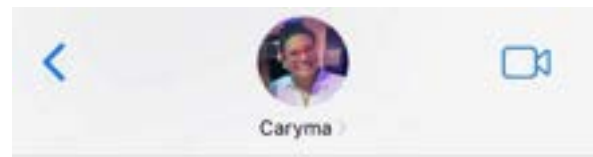
9:30 PM

But maybe a higher dose

you took the full or half

yes, I think the higher dose

9:33 PM



I took two of the R pills yesterday

It helped the way it was supposed to

I'm just a tank, I guess

You took 2 at once? Holy crap but I'm glad they were effective. Did you even get any sleep? Lol

The dry mouth would be awful but if you fill up on water you don't feel hungry



ask her to prescribe me that other pill that starts with A. But since I hadn't gone in ages and R works well on me, I wanted to get my 90 days (ahem, 180 days) worth

9:33 PM

I might angle for A

9:35 PM

It's surprising the full didn't work well. You must have been exhausted. Plus, you can't mingle it with downers bec they'll cancel each other out

9:35 PM

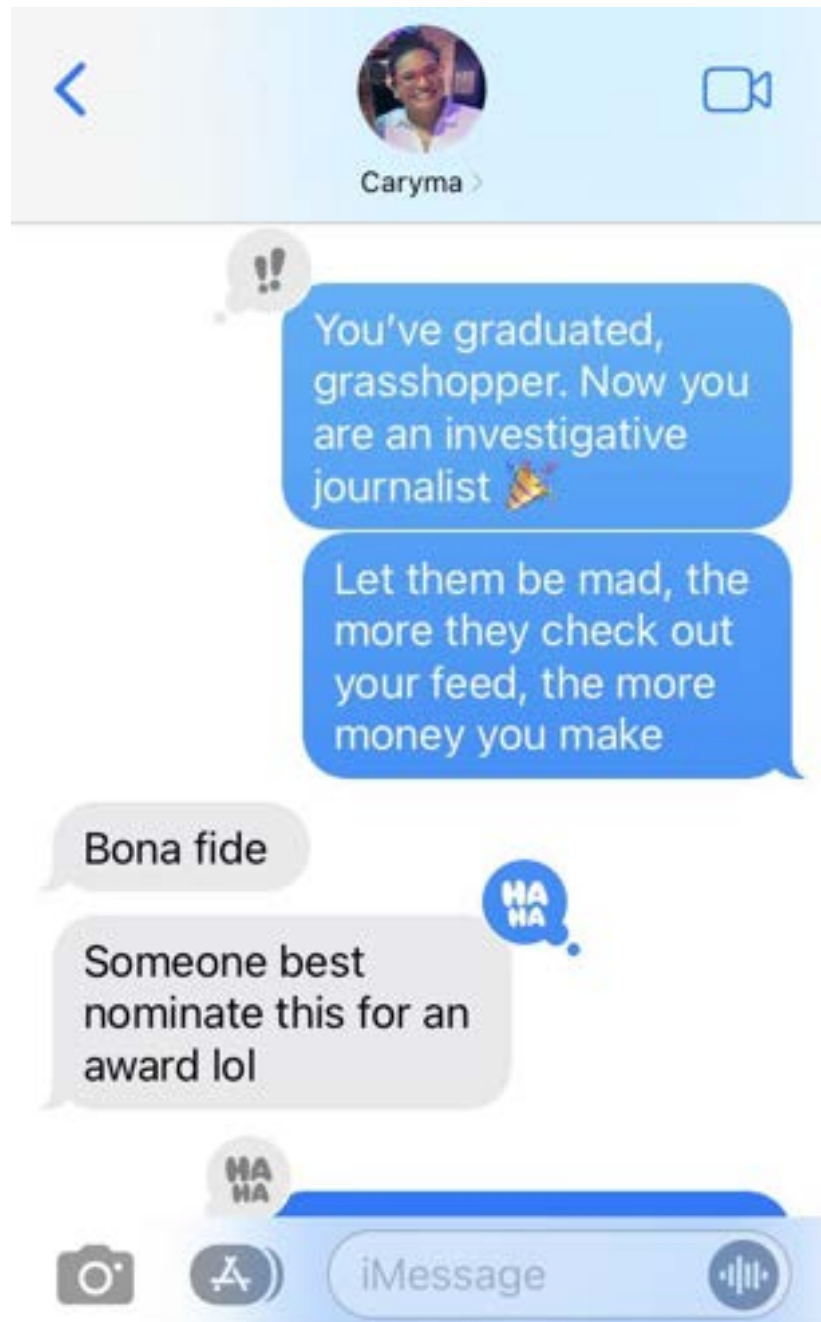


TAB 22



Before Elisa Hategan's mentorship, Caryma Sa'd did not call herself a journalist





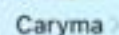
TAB 23

The following articles published under Caryma Sa'd's name were produced as a result of her collaboration with Elisa Hategan. They range from written in majority by Sa'd, to 50-50% joint effort, to taking first drafts written by Sa'd and enhancing them.

- 1) [Op-ed: I was James Bowie's client – and now I am being smeared by association](#) 12/15/22
- 2) ["Freedom" Fighters Vs Antifaux: Not The Heroes We Need Or Deserve](#) 02/01/2023
- 3) [Drag Storytime at the National Arts Centre](#) 02/14/2023
- 4) [Smear Merchants And The Canadian Anti-Hate Network: Simple Pawns Or Knowing Proxies?](#) 03/24/2023
- 5) [The Rise Of Culture Wars: How Polarizing Protests Are Dividing Communities In Ontario](#) 04/09/2023
- 6) [The Exploitation Of Children For Political Gain: A Look At Save Canada Vs. Antifaux At York Mills Collegiate](#) 04/16/2023
- 7) [The Collapse Of Civility: Examining The State Of Governance At The Law Society Of Ontario](#) 04/20/2023
- 8) [Understanding The Pattern Of Rage-Farming: Erica Ifill Vs Bingo The Dead Dog](#) 07/29/23
- 9) [Safer In A Viper's Pit: A New Chapter In My Disturbing Saga Of Online And Real-World Harassment](#) 08/24/2023
- 10) [The Hategate Affair: Unmasking Canada's Hate Industry](#) 09/11/2023
- 11) [The Complexities Of Protest And Intolerance: Unraveling The 1 Million March 4 Children](#) 09/21/2023
- 12) [Clothed In Controversy: The Political Messages We Wear](#) 09/22/2023

In addition to the articles listed above, Hategan wrote a [December 8 article](#) about Sa'd serving her Statement of Claim to Erica Ifill. She also spent significant portions of time engaged in significant research and development of additional articles, at least 3 of which were close to completion.

TAB 24

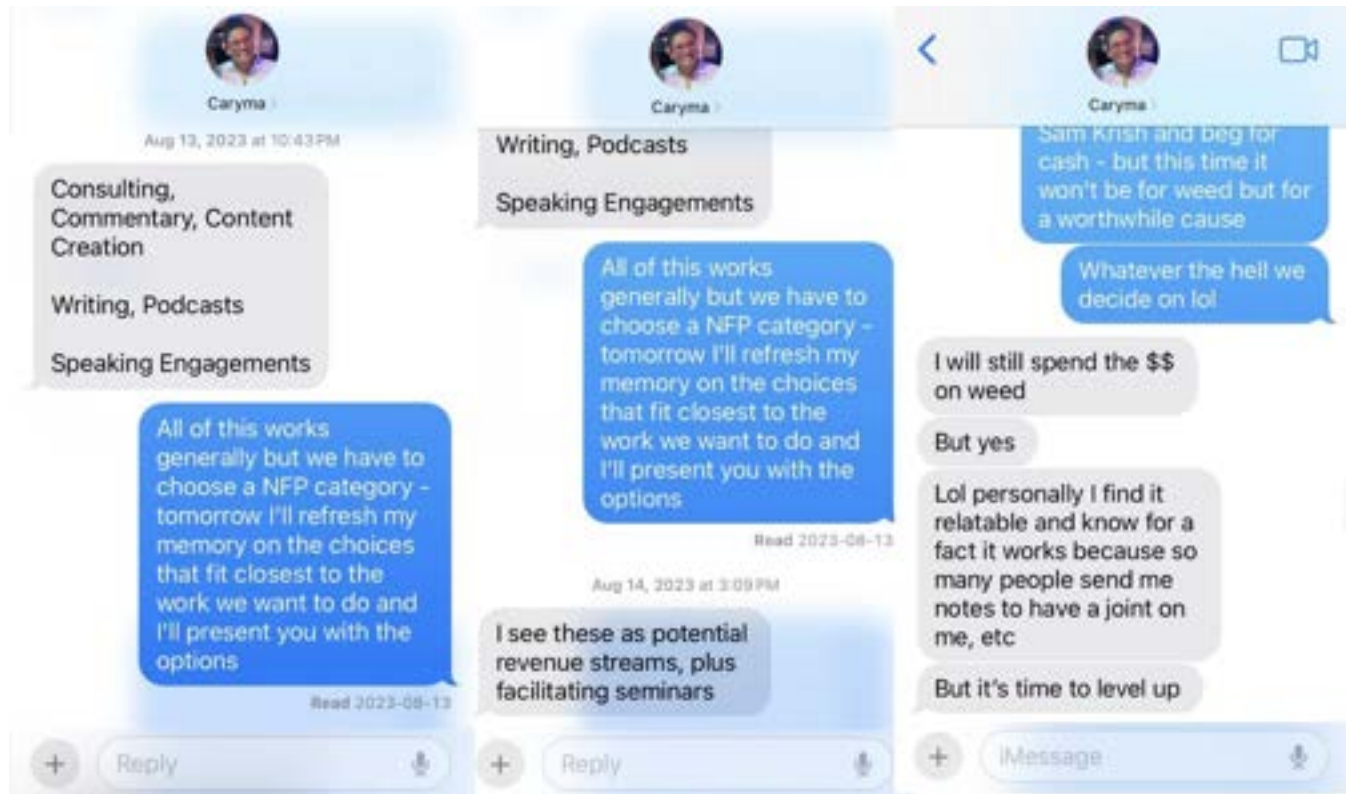
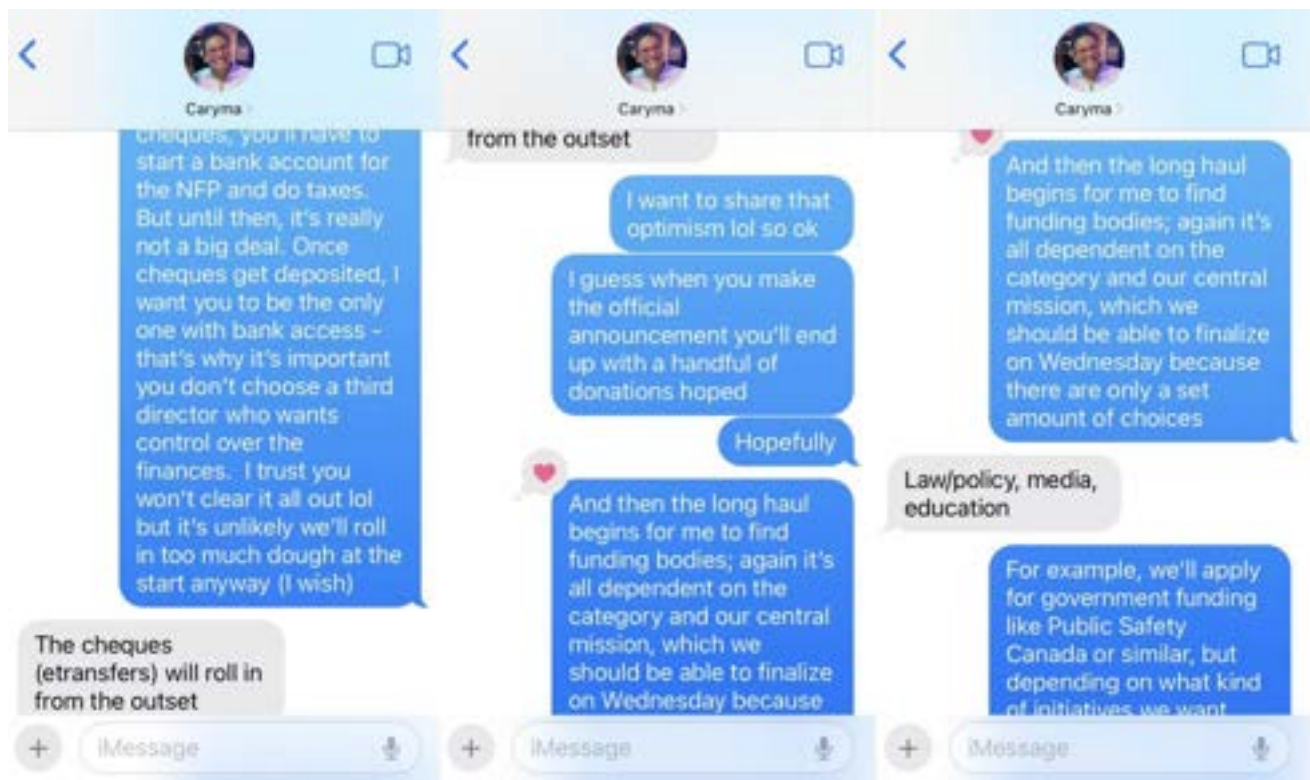


iMessage

TAB 25



TAB 26



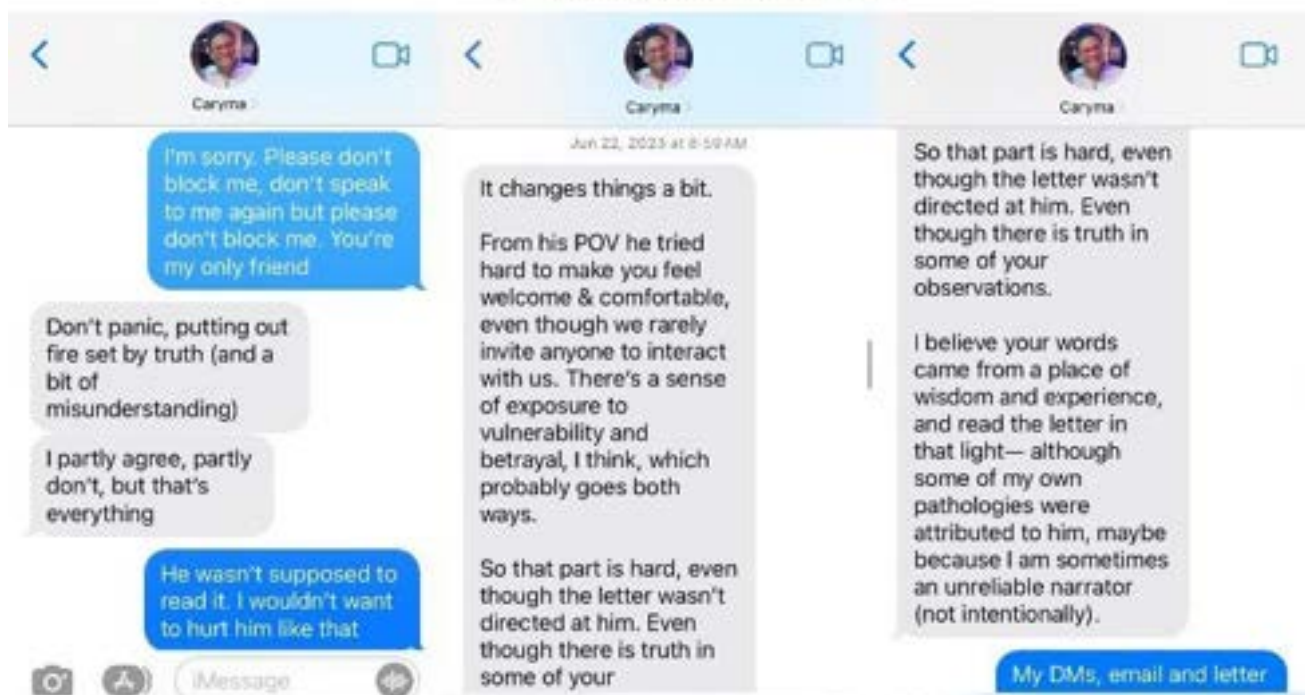
TAB 27

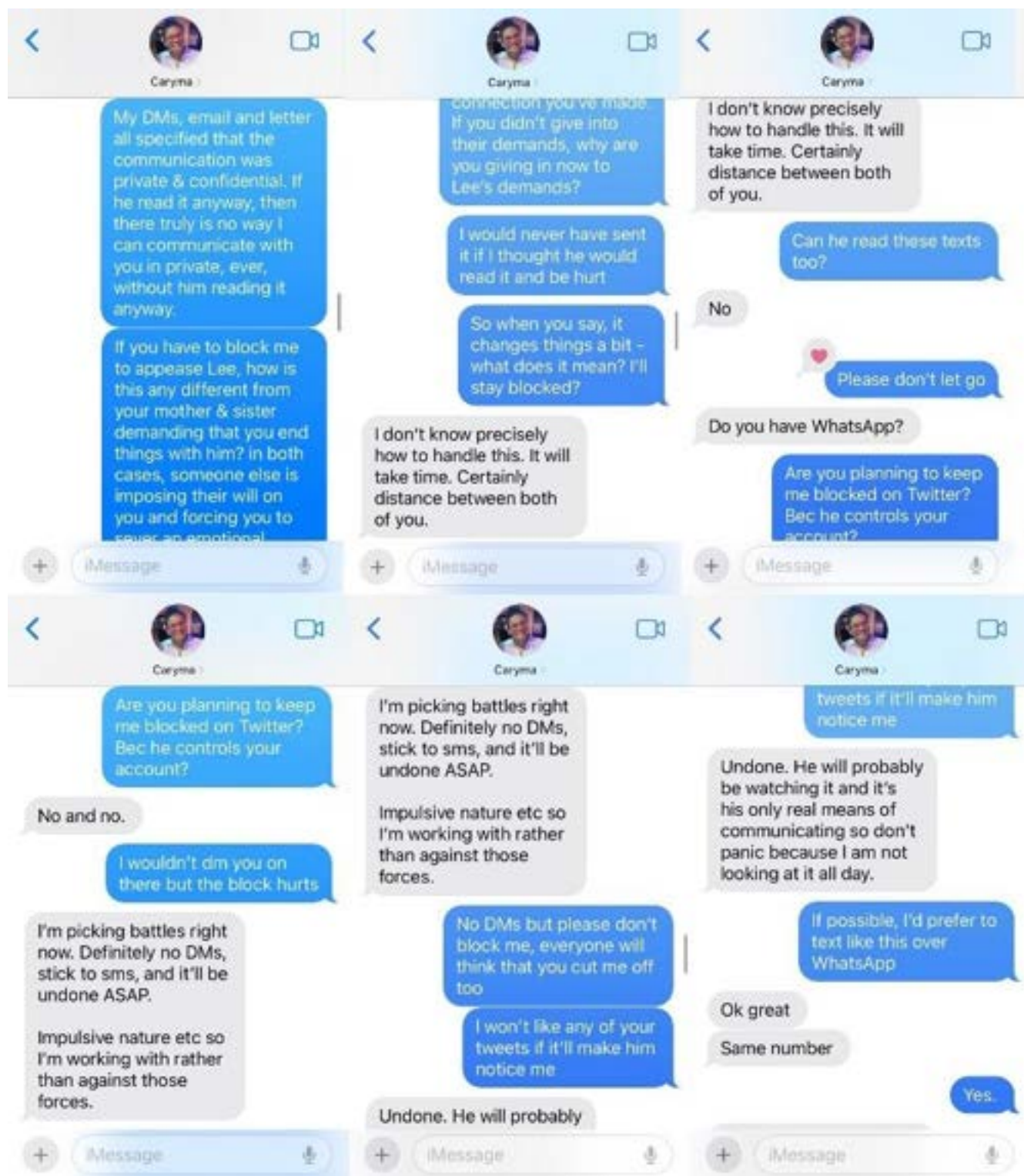
June 2023 text messages between Sa'd and Elisa, after Sa'd's boyfriend Adam Lee Wasserman blocks Elisa on Sa'd's social media against both women's will. Wasserman got upset after he hacked a private email account that Sa'd gave Elisa where she could send a confidential letter, and without permission read Elisa's concerns about his behaviour.

June 20, 2023



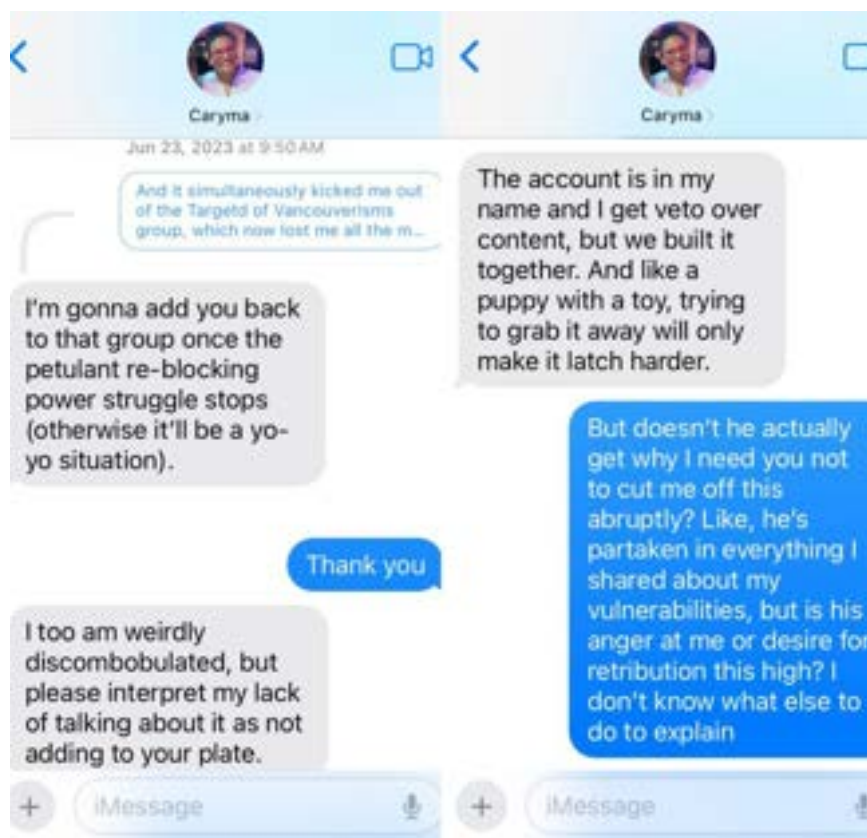
June 22, 2023 – Part 1





June 22-24, 2023 – Part 2





And it simultaneously kicked me out of the Target of Vancouverisms group, which now lost me all the m...

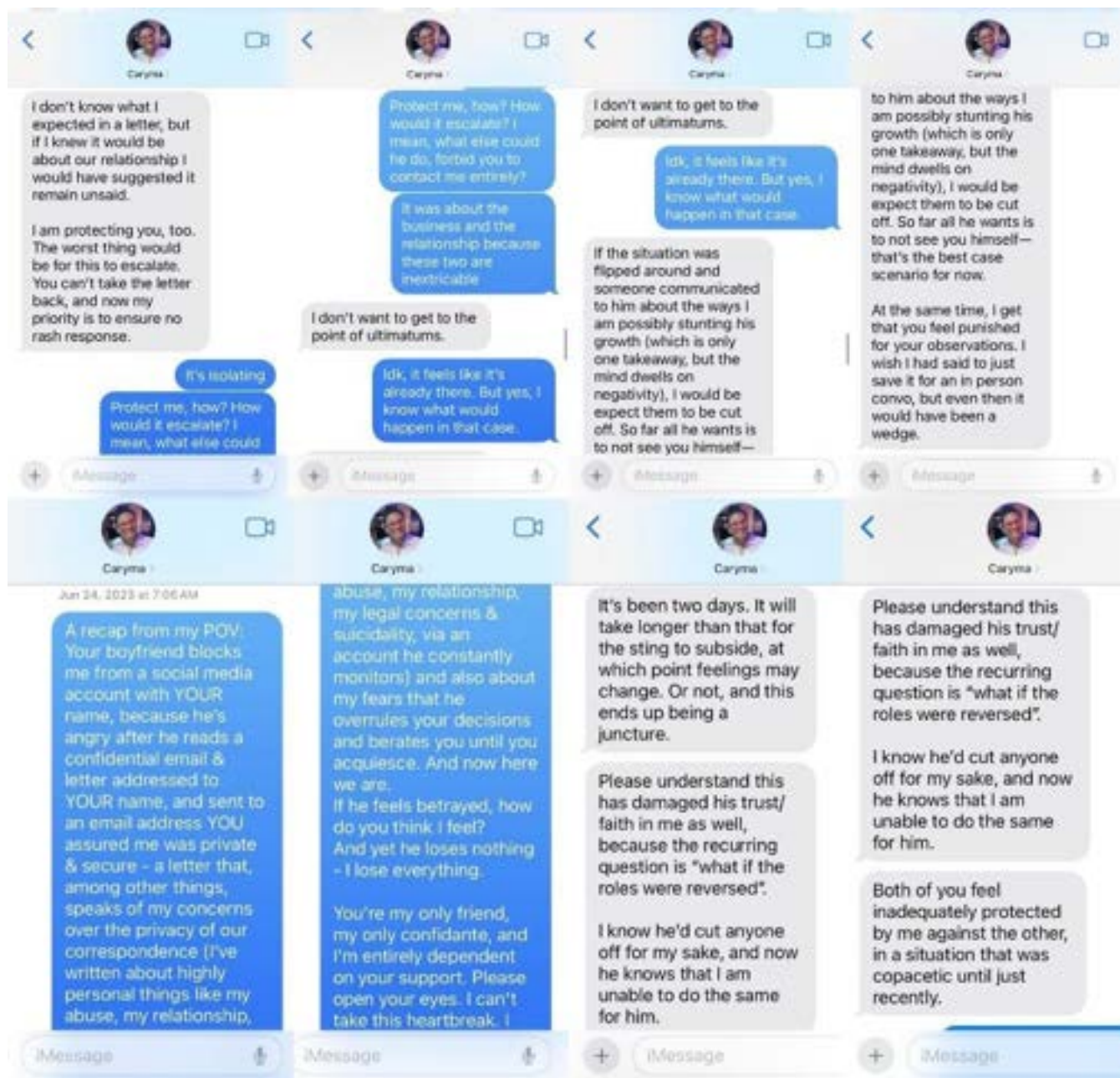
I'm gonna add you back to that group once the petulant re-blocking power struggle stops (otherwise it'll be a yo-yo situation).

Thank you

I too am weirdly discombobulated, but please interpret my lack of talking about it as not adding to your plate.

The account is in my name and I get veto over content, but we built it together. And like a puppy with a toy, trying to grab it away will only make it latch harder.

But doesn't he actually get why I need you not to cut me off this abruptly? Like, he's partaken in everything I shared about my vulnerabilities, but is his anger at me or desire for retribution this high? I don't know what else to do to explain



I don't know what I expected in a letter, but if I knew it would be about our relationship I would have suggested it remain unsaid.

I am protecting you, too. The worst thing would be for this to escalate. You can't take the letter back, and now my priority is to ensure no rash response.

It's isolating

Protect me, how? How would it escalate? I mean, what else could

Protect me, how? How would it escalate? I mean, what else could he do, forced you to contact me entirely?

It was about the business and the relationship because these two are inextricable

I don't want to get to the point of ultimatums.

Idk, it feels like it's already there. But yes, I know what would happen in that case.

I don't want to get to the point of ultimatums.

Idk, it feels like it's already there. But yes, I know what would happen in that case.

If the situation was flipped around and someone communicated to him about the ways I am possibly stunting his growth (which is only one takeaway, but the mind dwells on negativity), I would be expect them to be cut off. So far all he wants is to not see you himself—

to him about the ways I am possibly stunting his growth (which is only one takeaway, but the mind dwells on negativity), I would be expect them to be cut off. So far all he wants is to not see you himself—that's the best case scenario for now.

At the same time, I get that you feel punished for your observations. I wish I had said to just save it for an in person convo, but even then it would have been a wedge.

Jun 24, 2023 at 7:06 AM

A recap from my POV: Your boyfriend blocks me from a social media account with YOUR name, because he's angry after he reads a confidential email & letter addressed to YOUR name, and sent to an email address YOU assured me was private & secure - a letter that, among other things, speaks of my concerns over the privacy of our correspondence (I've written about highly personal things like my abuse, my relationship,

abuse, my relationship, my legal concerns & suicidality, via an account he constantly monitors) and also about my fears that he overrules your decisions and berates you until you acquiesce. And now here we are. If he feels betrayed, how do you think I feel? And yet he loses nothing - I lose everything.

You're my only friend, my only confidante, and I'm entirely dependent on your support. Please open your eyes. I can't take this heartbreak. I

It's been two days. It will take longer than that for the sting to subside, at which point feelings may change. Or not, and this ends up being a juncture.

Please understand this has damaged his trust/faith in me as well, because the recurring question is "what if the roles were reversed".

I know he'd cut anyone off for my sake, and now he knows that I am unable to do the same for him.

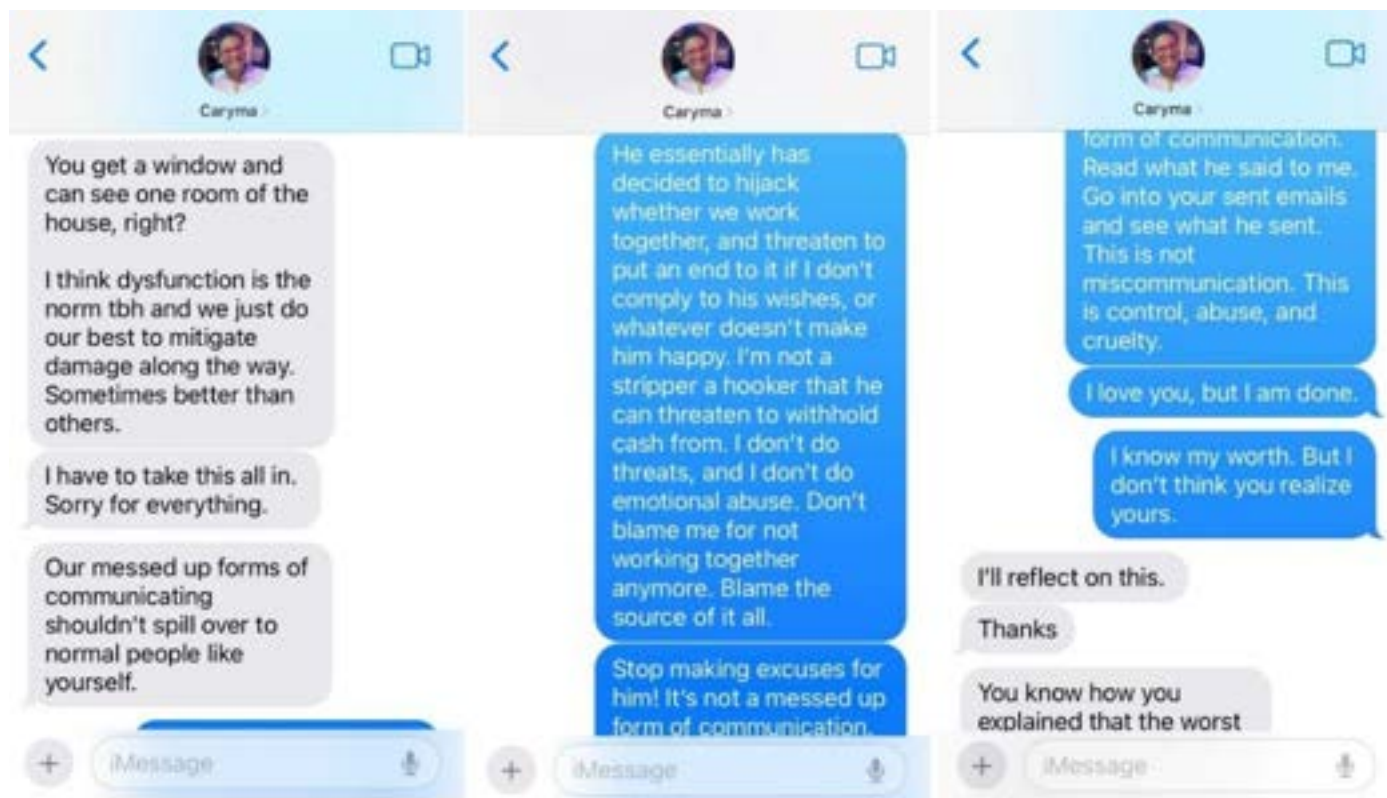
Please understand this has damaged his trust/faith in me as well, because the recurring question is "what if the roles were reversed".

I know he'd cut anyone off for my sake, and now he knows that I am unable to do the same for him.

Both of you feel inadequately protected by me against the other, in a situation that was copacetic until just recently.

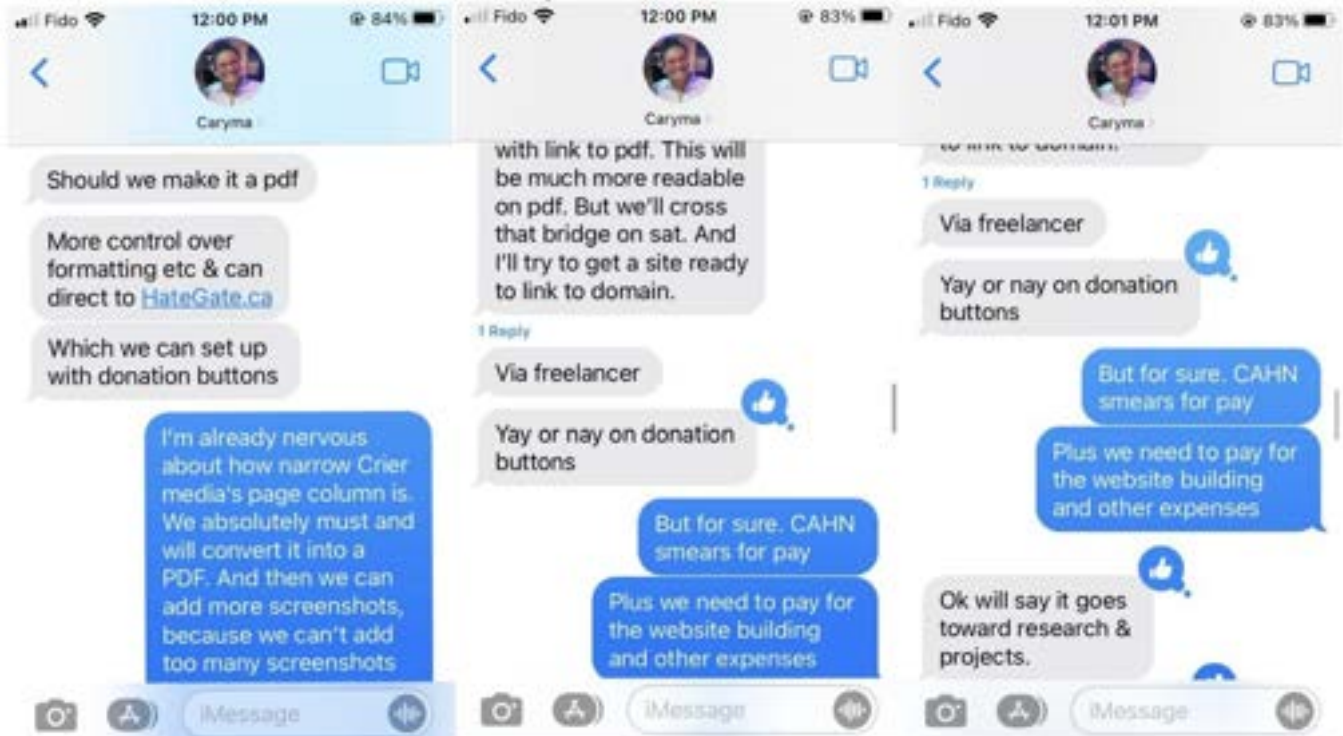
September 2023 text messages between Sa'd and Elisa after her boyfriend Adam Lee Wasserman blocks Elisa on Sa'd's social media against both the women's will.





TAB 28

September 7, 2023





Donation Received

You have just received a contribution of **\$10.00 CAD!** The donor's contact details are below. You may check on all contributions to your site in the [Donations page](#).

You can check your updated balance at [Stats](#).

DONOR NAME:
Megan CLARKE

DONOR EMAIL:

DONOR ADDRESS:

Nice - getting paid before we drop the motherload! That's why we should still keep the website, people will understand that your



iMessage



TAB 29

<https://dove-herring-wlpt.squarespace.com/>

Go

AUG

SEP

OCT

22

2023

2024

9 captures

12 Sep 2023 - 25 Oct 2023

2022

About this capture

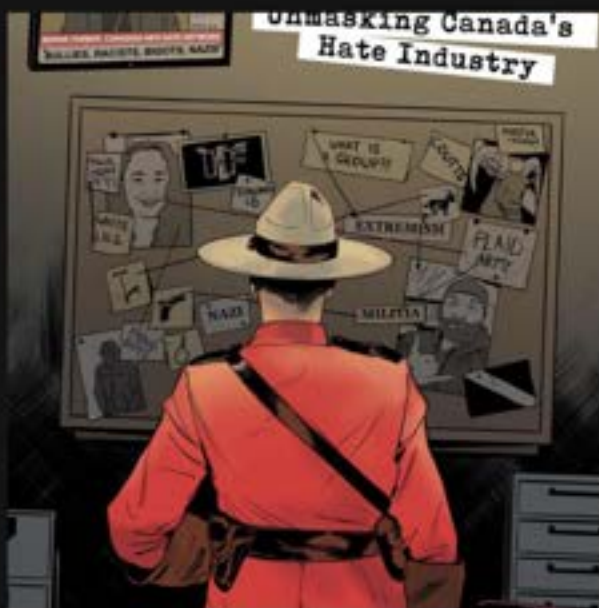
MAKE A DONATION

\$5

\$10

\$25

\$50



9/11/23

The HateGate Affair: Unmasking Canada's Hate Industry

[Read More](#)

Sign up for
Updates

Make a Donation.

\$5

\$10

\$25

\$50

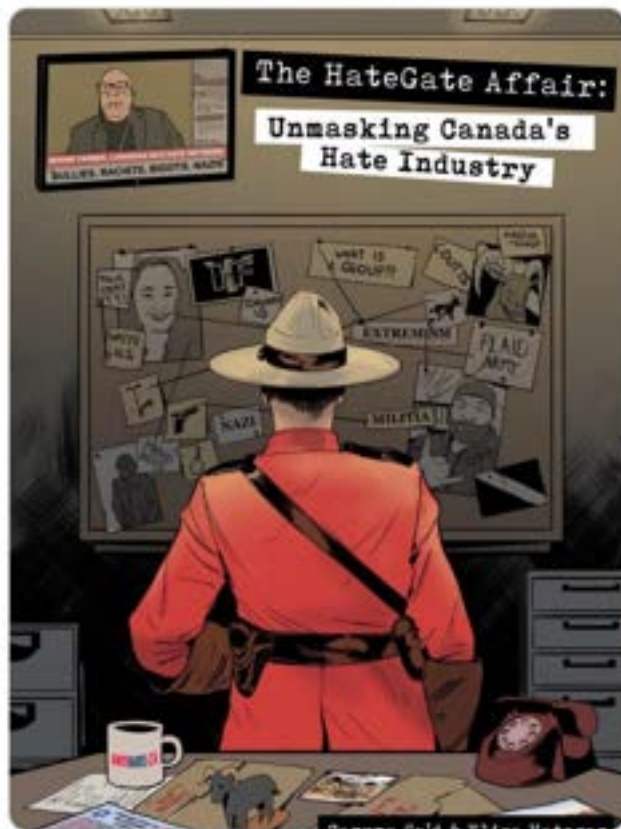


Caryma Sa'd - Lawyer + Political @Caryma · Sep 12, 2023 · ...

Part investigative journalism, part manifesto.

Full throttle.

READ MORE: [newswire.ca/news-releases/...](https://newswire.ca/news-releases/)



158 705 1K 353K



Caryma Sa'd · @CarymaRules Follow

What you see here is only half the story.

We are still sifting through 1000+ pages of information that require careful analysis, and plan to release other findings and relevant material as we go along.

Support this work by reading, sharing, and/or donating:

HateGate.ca #HateGate

6:59 PM · Sep 12, 2023 · 35.7K Views

22 84 308 8



Post



158 705 1K 353K



Caryma Sa'd - Lawyer + Political Satirist @CarymaRules Follow

What you see here is only half the story.

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22

84

308

8



Caryma Sa'd - Lawyer + Political Satirist ✓
@CarymaRules

Follow

...

Let this sink in: CAHN's fabrications about Diagon, parroted by a gullible Canadian press, then get picked up by international intelligence agencies, who demanded access to the intel files.

READ MORE:

finance.yahoo.com/news/documents...



Caryma Sa'd - Lawyer + Political S ✓ @CarymaR · Sep 12, 2023

Replying to @CarymaRules

What you see here is only half the story.

We are still sifting through 1000+ pages of information that require careful analysis, and plan to release other findings and relevant ...

[Show more](#)



Caryma Sa'd - Lawyer + Political Satirist ✓
@CarymaRules

...

Canadian icon @elisahategan is not afraid to pull back curtains. She has a beautiful way with thoughts & words.

Without her, there would be no #HateGate exposé.

Check out "Race Traitor" to understand how the state can use hate to weaponize civilians against each other.



Elisa Hategan (אליסבט) 🇮🇱🇺🇦🇵🇸🇧🇪🇨🇦 ✓ @elisahategan · 13h

If you read our #HateGate report and want to learn more about the role

← Post


@JT.2022
 @JimmyT2022

Follow

Donate to her cause. She has been amazing through this and has a bigger set than most media outlets "reporters". Ill be making a donation. #HateGate



Caryma Sa'd - Lawyer + Political Satiri @CarymaRule · Sep 14

The goal of harassment is to isolate the target, but I am not alone. I am willing to talk to anyone who has been targeted by the CAHN smear pipeline.

They know what they're doing. But so do I. Or at least, I am learning...

[Show more](#)


← Post


Caryma Sa'd - Lawyer + Political Sa @CarymaRule · Sep 15

@thecriermedia journalists @CarymaRule and @elisahategan, who obtained 1,000 pages of internal communications through the Freedom of Information Act, compared it to taking the games Risk or Dungeons & Dragons at face value.



43 76 5.4K


cy clemons @CyClemons · Sep 15


1 1 6 13


Elisa Hategan (אליסבטגאן) @elisahategan

Follow

Thank you so much for your generous support! 🙏

5:24 PM · Sep 15, 2023 · 116 Views



Lovers In A Dangerous Time - WEF Wants to Harm You @Co... · 3h ...
Most Canadians have NO IDEA what is going on.

Do you need funding? Do you have a GoFundMe account?



Elisa Hategan (אלישבט) @elisahategan · 3h ...

Yes, I absolutely need funding. Others are profiting from my work, in terms for cash & connections, while I've been pretty much ghosted from my own work.

I don't have a Gofundme, for various reasons. But I'm asking for direct donations to elisa@elisahategan.com 🙏



Lovers In A Dangerous Time - WEF Wants to Harm You @Co... · 3h ...

I will donate as much as I can. Maybe @CarymaRules can contribute your half of what was promised. And I know I donated via the [#hateGateAffair](#) website.



Elisa Hategan (אלישבט) @elisahategan · 3h ...

Could you please tell me how much you donated? In DMs if you're not comfortable here. Because I technically should have received half of it.



Lovers In A Dangerous Time - WEF Wants to Harm You @Co... · 3h ...

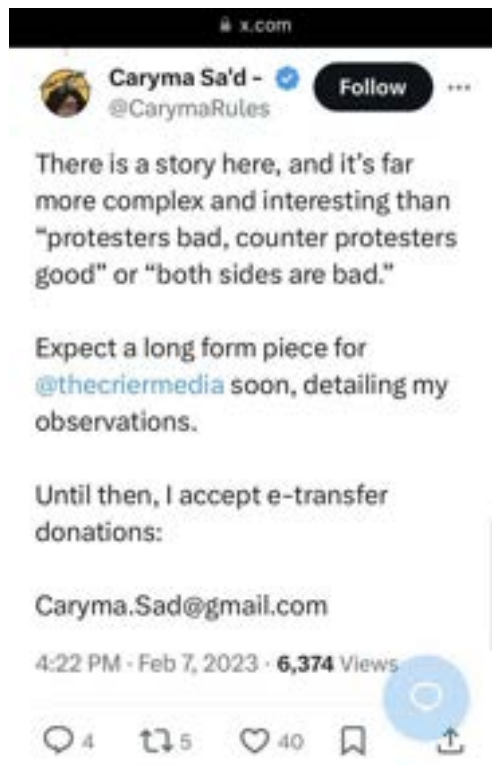
I believe I donated \$50 via the web site.

@CarymaRules you own her \$25 and many more dollars!



Post your reply





← Post



Caryma Sa'd - Lawyer + Political Satirist ✓

@CarymaRules

Follow

...

It's been ONE WEEK since [#HateGate](#) dropped.

- ✓ The hashtag has trended every day.
- ✓ Politicians are being politely questioned about the exposé on the street.
- ✓ The message is getting out through news articles, videos, livestreams, and podcasts.

This is just the beginning.

Trending

#HateGate

4,454 posts

Trending in Canada

#1MillionMarch4Chidren

6,361 posts

Sports · Trending

Bret Hart

7:44 PM · Sep 19, 2023 · **22.7K** Views

💬 23

↻ 114

❤️ 331

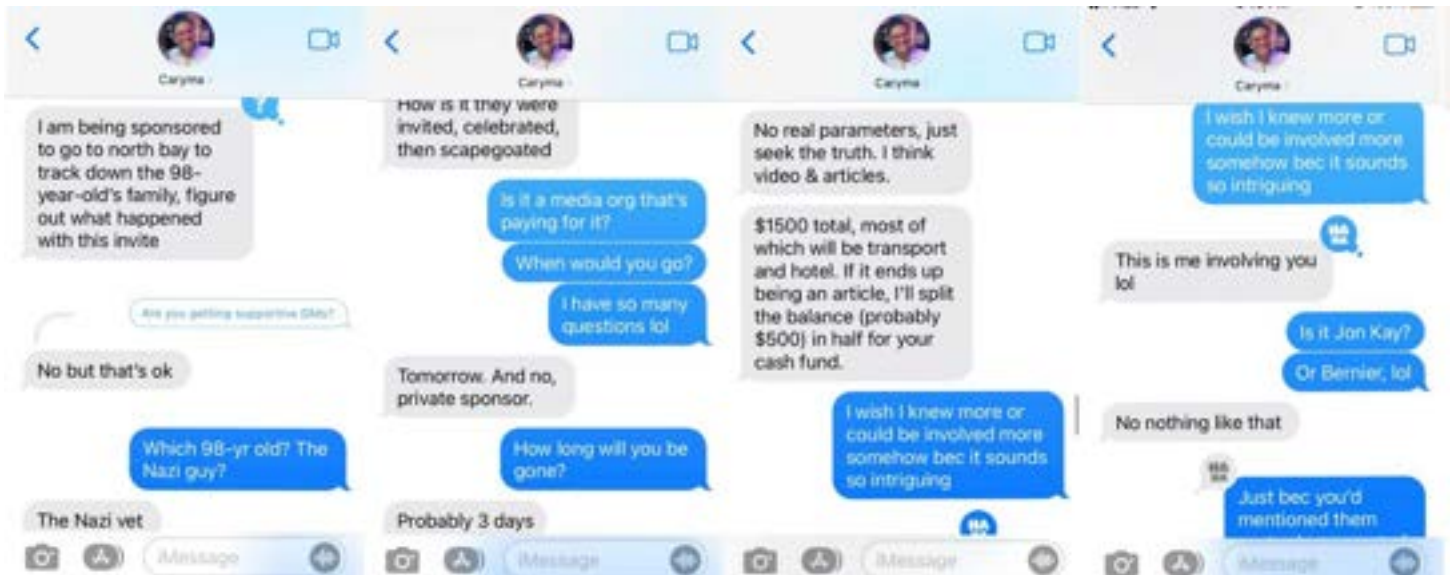
🔖 2



TAB 30

September 25, 2023 text messages from Sa'd to Elisa

Sa'd offers Elisa approx. \$250 to travel to North Bay with her for an article. Elisa spent 4 days working on the article, but was not reimbursed for her work or transport costs.



TAB 31

North Bay transportation costs that were not reimbursed by Sa'd

Ontario Northland Purchase Confirmation [Transaction: WGS8SZRS]

Confirmation from Ontario Northland

THIS IS YOUR RECEIPT, NOT YOUR TICKET - YOUR TICKET IS ATTACHED IN PDF FORM BELOW.

You must travel on the date and time selected.

Before arriving at the station, please print a paper copy of your ticket. Alternatively, you may show your electronic ticket on your mobile device.

Vous devez voyager a la date et l'heure choisie.

Avant d'arriver à la gare d'autocars, veuillez imprimer une copie de votre billet. Autrement, le voyageur peut montrer son billet au chauffeur d'autocar sur un dispositif mobile ayant accès à Internet.

Transaction: WGS8SZRS

Customer #: [REDACTED]

Transaction fees: \$ 2.00

Transaction fees taxes: \$ 0.26

Total paid: \$ 101.36

TICKET: MJAFVF

Passenger: Elisa Romero

Email: [REDACTED]

Fare: Adult

Class: Firm

Departs: Thu Sep 28, 2023 5:45 PM

Arrives: Thu Sep 28, 2023 10:30 PM

From: North Bay - ONTC "The Station" - 100 Station Rd

To: Ottawa - VIA Rail - 200 Tremblay Bus Stop main entrance

Brand: Ontario Northland

Price: \$ 87.70

Discounts: \$ 0.00

Fees: \$ 0.00

Special requests: \$ 0.00

Taxes: \$ 11.40

Total: \$ 99.10



Your GO Transit purchase, Confirmation #MZ58695453**Your GO Transit E-ticket/Pass details****Confirmation Number:** MZ58695453

Hi Elise,

Thanks for choosing GO, we're looking forward to having you ride with us! It's important that you don't delete your confirmation email, as it contains links to your GO ticket(s) or pass(es).

We take your safety seriously. [Learn more](#) about the proactive steps that we are taking to keep you safe.

How to Use Your E-ticket/Pass:

1. Use your smartphone with a data or Wi-Fi connection to open the confirmation email and access your e-ticket/pass link(s).
2. Click on the link that corresponds with your trip to access and then activate your e-ticket/pass 5 minutes prior to travel. A data or Wi-Fi connection is required for activation.
3. 5 minutes after activating, your e-ticket/pass will be valid for travel.

One-Way/Return Trip E-tickets: Once ticket is activated, one-way and return trip e-tickets are valid for 4 hours.

Passes: Passes are valid for the entire day until the end of service hours on the day of activation or as otherwise stated (weekend pass).

Please note that at the time of fare inspection you must be connected to data or a Wi-Fi network, and once an e-ticket/pass is activated it cannot be de-activated.

Activate Your E-tickets/Passes 5 Minutes Prior to Boarding

2. Click on the link that corresponds with your trip to access and then activate your e-ticket/pass 5 minutes prior to travel. A data or Wi-Fi connection is required for activation.

3. 5 minutes after activating, your e-ticket/pass will be valid for travel.

One-Way/Return Trip E-tickets: Once ticket is activated, one-way and return trip e-tickets are valid for 4 hours.

Passes: Passes are valid for the entire day until the end of service hours on the day of activation or as otherwise stated (weekend pass).

Please note that at the time of fare inspection you must be connected to data or a Wi-Fi network, and once an e-ticket/pass is activated it cannot be de-activated.

Activate Your E-tickets/Passes 5 Minutes Prior to Boarding:

Click to activate MZ58695453

[Newmarket GO to Barrie South GO](#)

Ages 13 to 64. Valid until October 03, 2023.

Visit [GOtransit.com](#) to find train and bus schedules.

Passenger Information:**Name:** Elise Romero**Email:** [REDACTED]

This mobile ticketing experience is new for GO, and we want to hear about your experience. [Give us feedback about your experience by filling out a short survey here.](#)

Receipt:**Total Price:** C\$10.05**Credit Card Number:** **** * [REDACTED]**Credit Card Type:** mastercard**Trip Planning:**

We're modernizing our stations and building new ones, boosting our infrastructure and providing more ways to access stations. [Check if you may encounter construction on your journey.](#)

Cancellations/Changes:

No cancellations, refunds or changes. Your ticket is not transferable and is valid for use only. The terms and conditions of your trip are governed by the [Metrolinx By-Laws](#).

TAB 32

MESSAGES FROM CARYMA SA'D TO ELISA HATEGAN, Oct 2022 – Sept 2023

“You’re an inspiration.” – Caryma Sa’d, October 15, 2022

“There’s nothing they could say to make me question your intentions or **authentic, innate goodness.**” – Caryma Sa’d, Dec 2, 2022

“You’re a **miracle worker**” – Caryma Sa’d, January 1, 2023

“You can call me any hour of the day or night.” – Caryma Sa’d, January 7, 2023

“I love you. And Lee loves you. We both love you.” – Caryma Sa’d, January 19, 2023

“If spite isn’t enough to sustain that will [to live], **I hope love is.**” – Caryma Sa’d, January 27, 2023

“The more I know you, the more I admire you.” – Caryma Sa’d, March 10, 2023

“Elisa Hategan is a national hero who does not get due credit for her accomplishments.” – March 25, 2023

“You are a big part of whatever success we have.” – May 18, 2023

“I made a promise to you that I would never break. But even not knowing you long has impacted me more than many **lifelong friendships.** [...] You’re **too important to erase.**” – Caryma, June 6 2023

“I hope that I explain this right, but when you said “imperfect witnesses” earlier I was like, “Imperfect isn’t exactly it because **Elisa hasn’t done anything wrong**” – Caryma Sa’d, September 5, 2023

“Canadian icon @ElisaHategan is not afraid to pull back curtains. She has a beautiful way with thoughts & words. Without her, there would be no #Hategate exposé.” - @CarymaRules Sept 18, 2023

“You are a masterpiece” – Caryma Sa’d, September 7, 2023

“I love you both.” – May 27, 2023

“I love you both.” – September 18, 2023

I don’t think it was a figment of my imagination. **The synergy, how our thoughts meld.**” – Caryma Sa’d, September 18, 2023

“I hate that he was careless in his expression, and hurt you. For that I am **endlessly sorry.**”

“I’m sorry, but please don’t quit what we have.” – Caryma Sa’d, September 18, 2023

“We would take bullets for each other” – Caryma Sa’d, September 29, 2023

“After a lifetime of you fighting, it’s my turn for the heavy lifting. I wish we were of the timeline where we had private island and limitless credit cards. I hope those versions of ourselves realize how good they have it. But I also know that in another timeline, we never properly crossed paths and this connection never came to be. So **I realize how good I have it.**”– Caryma Sa’d, September 30, 2023

“I’ve spoken with several officers **ever since October 1st** on this situation [...] I provided supplemental reports on October 4th, 10th and 11th.” – Caryma Sa’d to police, October 14, 2023

TAB 33

Article By Adam Lee Wasserman About Sa'd And Hategan's Relationship

<https://web.archive.org/web/20231009080144/https://thegatekeeper.substack.com/p/my-story>

Original Link: <https://thegatekeeper.substack.com/p/my-story>

My Story



[Gatekeeper](#)

Oct 7, 2023

We met in the back of a café.

I remember the exact date, but She never can. That's okay. She was engrossed in her notebook. I noticed how her face scrunched up in concentration, how she'd scribble quickly for a few minutes, and then pause, gazing into space. I approached her during one of these daydreams. She was friendly. I learned that she was an articling student on some sort of break. I had never heard of "articling" before, but it's basically an apprenticeship for lawyers. After eight years of university and law school, She told me she only needed seven additional weeks working at a law firm to get licensed. She stubbornly insisted the world of law wasn't for her but looked unhappy saying it.

I invited Her to dinner. We sang karaoke. Truth be told, we have not spent a night apart ever since. (Except for her travelling across the country to report on court appearances, usually on a whim. I stay back and feed the pets.)

After a few weeks of gentle encouragement, She decided she wanted to get called to the bar after all. I was there for every step along the way. I walked her to her first day back at the office. I met her for lunch to count down each day.

I watched Her walk across the stage the day she became a lawyer. Her family was there too, sitting in a different section of the auditorium—they were uncertain about my intentions, and worried about their straight-edged, straight-A superstar rejecting traditional pathways to success. There was a period of estrangement borne out of obstinance.

Fast forward a few years, and She was rubbing shoulders with the most esteemed members of her profession. Reporters kept calling for her opinions and commentary. She was constantly on the news. She was invited to speak at conferences. Even before they reconciled, her dad used to park on the sidewalk and proudly admire her signage at the front of the shopping mall where Her law office was located.

The pandemic screwed everything up. But not really. We learned to pivot.

In 2020, She decided to try something new. We rented a store in the shopping mall courtyard and hosted 28 outdoor comedy shows throughout the summer.

In 2021, her dad died. She was consumed by what-ifs about his COVID skepticism. She wanted to understand *why*. I supported her journey to try and resolve unanswerable questions. We began documenting the Freedom Movement, equipped with only iPhones and scooters.

Everything changed after She published an editorial comic about a Controversial Personality. I thought he was too niche to bother with, but it was her call. Neither of us anticipated the response. The comic triggered an avalanche of mostly abusive notifications from right-wing accounts. This was only a few weeks after her dad's burial; I was afraid she would sink into depression.

To my surprise, she decided to publish another comic about the same Controversial Personality. Then another. We recorded a few silly vignettes. And so, her persona was born.

It was me who suggested launching that summer's comedy season by interviewing the Controversial Personality. We had no idea or warning that a group of people planned to ruin the event. A bunch of thugs showed up and blockaded the courtyard staircase. They were dressed in black wearing masks. They were ready to hit, and they did. It was the first time I saw real violence in the protest scene, and it happened outside Her office where, after four years, we had established our home. None of it made sense... why attack a comedy show when nobody had ever stopped the Controversial Personality from speaking at his own rallies?

She was torn up. It was a cross-roads. We could try to return to normal life, or double down. After much deliberation, we recorded a vignette calling out a different Controversial Personality. There was no turning back.

The fallout from the blockaded comedy show triggered a new avalanche of abuse, this time from left-wing accounts. They smeared Her as a racist, white supremacist, and threat to her community. Some of the vigilantes who showed up to attack in real life were now destroying her reputation online. I promised, "We will find each and every last one of these fucking pricks." And that's what we did.



Source: Twitter

I am not ideological, so the whole thing seemed stupid and crazy to me. The lines between right and left were blurry. She explained that an anonymous “antifascist” who showed up at the blockade was outing himself as an ex-Proud Boy. I asked, “What’s a Proud Boy?” I had a lot of catching up to do.

A few weeks later, the same Proud Boy was in my face. He and his friend tried getting me killed by a Hindu Nationalist. When that didn’t work, they tried falsely portraying me as the guy’s best friend, instead. (I later came to learn that the Proud Boy and the Hindu Nationalist were themselves buddies, even after the former’s supposed switch to antifascism. Every accusation is a confession.)

There were targets on our back. We were intimidated at rallies. Anonymous accounts hunted our private information. She was threatened in a park when the Proud Boy’s friend came up from behind and said, “We know where you live.” This rattled her sense of safety and security to its core. She needed a breather from the toxicity. That night, I started looking for a place to live outside the city. We packed up and relocated to Perth within a couple of weeks.

Our move unexpectedly paid off. Perth is close to Ottawa, so we were able to cover the Freedom Convoy in 2022. Our footage travelled across the globe. From there, we returned to Toronto.

In a slight change of pace, She wanted to document Doug Ford’s campaign trail leading up to the provincial election. Never in a million years did I expect her to end up in handcuffs, but that’s exactly what happened at an event in Hamilton. I was in shock. She got released with a trespassing charge. Within five minutes, journalists were on the phone. Now she was in the market for a lawyer.

Prominent Lawyer contacted her, offering pro bono support. He got popular during the Freedom Convoy. He was vetted by mainstream media, or so we assumed. We had only met him once in

person, at a bar— I am comfortable in my relationship with Her, so I ignored any misgivings. He did an excellent job, and She got vindicated when the charges were withdrawn.

Not long after, Prominent Lawyer became Notorious Lawyer. He faced his own headline debacle and was labelled a predator. The story kept getting worse and worse. Online harassers made a big deal over a few staged photos of him and Her, grossly overstating their relationship. I knew she needed to say something publicly. The problem is, she is a perfectionist and has a full plate. It sometimes takes too long for her to execute non-work projects. She needed a writing partner.

Enter Former Nazi. An unusual pairing, but this woman had been in Her Twitter DMs intermittently since the comedy show fiasco. They were tormented by many of the same accounts and individuals. I guess they bonded through trauma. Former Nazi presented herself as wanting to push out of a depressive slump; she felt robbed of her own life story. We were sympathetic, and open to a mutually beneficial collaborative relationship: she would help with writing articles, and in the process get back into the swing of creative work as a distraction and to focus on new opportunities.

The first piece was great. It came out quickly, and got picked up by a local publication. They were both enthusiastic about future projects. I proposed making this an ongoing relationship. Former Nazi refused money, despite my insistence. This was our first mistake. It made for messy boundaries. And sure enough, the trauma bond started to look like love.

In 2023, She began to slowly withdraw into her text messages and DMs with Former Nazi. A distance grew between us. For the first time in our relationship, I felt left out. It made me hollow inside.

Former Nazi came to visit a few times, always showering Her with gifts: dried mango, fruit jam, books, and other trinkets. She gave her a fancy pen, saying that Amazon sent two items instead of one, so it was meant to be and now they were spiritually connected by sharing the same tool. She gave her a wireless microphone, explaining that her partner had money to blow on office expenses before year end. To my dismay, she offered a few prescription pills to help with “concentration.” I threw these away. It was a hard line for me.

On one occasion, they went to a magic mushroom retail store and tripped out in the park. I understood She was hoping for an epiphany, but none came.

In June 2023, there was a large protest in Ottawa. Both sides assembled their street warriors. We decided to go film, and I suggested inviting Former Nazi so she could continue building a new catalogue of experiences and move forward. I was appreciative of her work, and wanted to show that her life story was not over. I also wanted Her to see that I support her endeavours so she would stop shutting me out.

The trip went well, or so I thought. I expected they’d publish an article about what took place at the protest: the surprisingly large presence of Muslim families; MPP Joel Harden’s questionable claim of being assaulted by his own megaphone; tactics used by protesters and counter protesters. The possibilities were endless.

Turns out, Former Nazi was too busy documenting me. She sent Her a fourteen-page letter dissecting our personal relationship. There were some backhanded compliments, but it was essentially a hit piece. I told Her, “Once a Nazi, always a Nazi.”

I wanted their relationship to end at this point, but She insisted it could be salvaged. She begged me to give Former Nazi another chance, saying I misunderstood her intention behind the letter. She promised to dial back the relationship. At the same time, they continued exchanging platonic I love yous. I wasn't happy.

They wrote a few more articles, and then a bigger project. They coined a hashtag that gained momentum. Former Nazi did a good job of winning me back over. She stopped talking about me, and She seemed happy. We met for a celebratory dinner and I waved off her attempt to apologize for the hit piece in person. It was supposed to be a double date, but she and her partner were fighting. She was upset that her partner hadn't finished the final chapters of their latest project. To make her feel better, She ribbed me about barely reading any of it. Of course, we all knew that I was busy questioning politicians in the street.

There was some overstepping by Former Nazi as the project gained traction: she threatened an anonymous account with litigation on Her behalf without speaking to us; she tried policing how others used the hashtag; she had a public meltdown when a blogger neglected to include her name, which ended up being an inadvertent omission. I emailed her to stop being petty and negative. I was aware of her hangups about erasure, and She made a concerted effort to give her credit.

There was a chance to turn things around when a Nazi veteran was honoured with a standing ovation in the House of Commons. We got an opportunity to travel to North Bay to interview him and his family. I invited Former Nazi to join us, figuring she might appreciate building her name on current events, rather than being stuck in the past.

I thought this trip went well, too. We didn't manage to locate the Nazi war veteran, but we pulled back the curtain to show our boots on the ground journalism in real time. We got flack online from the usual suspects, and others who took offence at our audacity to show up and ask questions. This comes with the territory because She gets criticized for every move she makes.

A couple of days after returning home, I found out Former Nazi was publicly tweeting about committing suicide. It only came to my attention because one of our mutual stalkers was mocking the entire situation. I realized that not only was She mentioned in the post, but it was published mere hours after She shared a picture of them smiling together. And all this in the middle of trying to promote a project that was gaining steam.

It is not a crime to want to apply for MAID. Nor is it a crime to speak openly about it. But once you involve other people, it becomes their business. And my gut instinct was to protect Her and her brand, because none of this sat right. It may have been a cry for help, but we were not in a position to provide the necessary support. Some people cannot be reached because of the conditions they have.

I blocked Former Nazi. There were objections and She unblocked. It took an ultimatum for Her to see the seriousness of my concerns. I have never issued an ultimatum before. She knows I will follow her anywhere. Freedom rallies. Below freezing temperatures, day after day and night after night at the convoy. The restricted area behind a police station. The centre of a hostile crowd. To the end of the earth. But **it was a choice between me and Former Nazi**, and Her choice to make alone. At the eleventh hour, she decided to cut ties with Former Nazi.

There is no need to go into detail about what happened next. It's enough to say I had to watch Her agony as my deepest fears were validated. She was flooded with threats, extortion, and love

bombing. It is hard to say whether the desperation was fuelled by obsession or manipulation. Possibly a bit of both.

Narcissists are attracted to the people they hate the most so they can control them. It makes me sick to think of anyone trying to control Her. When we first got together, her ex-boyfriend was preying on her kindness to try and take her cat, a laptop, and anything else he could squeeze. She would constantly get upsetting phone calls and text messages. One day, she handed me her phone, looking dejected but hopeful: “Can you get him to stop?” I took it as an honour, considering she usually advocates for others. I was polite but firm. He never called back again.

I am Her chosen gatekeeper. She is my hard-headed muse. We have an established working relationship and mutual respect. She sees me. She loves me. She trusts me to look out for her on her terms. We stick together through hard times. I delight in being there for her.

I know my role, and shut my mouth— until now. This is my first time breaking silence.

We didn’t go looking for any of this. The fight came to our front door, quite literally. We will go around, above, or through anyone who gets in our way.

I thought I was with Her for a good time, but it’s been a long time. And I’m staying put.

TAB 34

LINKED TO RACIST HERITAGE FRONT

Cop faces charge

Toronto Sun 93-12-16

By BILL DUNPHY
Toronto Sun

A young cop faces Police Act charges over his links with the racist Heritage Front, the Sun has learned.

A discreditable conduct charge filed two weeks ago alleges Metro Const. Brad Coulbeck, 24, is on the Heritage Front mailing list, has purchased and distributed Heritage Front material, and attended a 1992 Ku Klux Klan rally in Arkansas.

But Sun sources close to the Front go further. Coulbeck, they say, is a Front member.

Front defector Elaine Hategan has sworn an affidavit for the Canadian Centre on Racism and

Prejudice recounting a chance meeting with Coulbeck in a courthouse last summer.

Although Hategan didn't respond to interview requests, her affidavit alleges Coulbeck recognized her from a Front video. She swears she was later told by a founding Front member that Coulbeck was a member.

Centre spokesman Martin Theriault said his group was aware of Coulbeck's involvement with the force and called for an "independent civilian inquiry to deal with the issue."

One Front member, too scared

to be identified, told the Sun a similar story two months ago.

Reached at his west Toronto home yesterday, Coulbeck admitted he'd bought a Heritage Front newsletter subscription and videos but vehemently denied being a member or agreeing "with everything they stand for."

"I was not a member and never have been," he said. "I am not a racist."

He also denies ever attending a Ku Klux Klan rally or any racist group's meeting.

He admitted he knew researching radical groups and knew read-

ing about politics.

Coulbeck, who joined the force in March 1992, said he initially called the Front's hotline in about November 1992 because a cousin wanted information on the group for a high school newspaper. He got the hotline number from a newspaper story, he said.

Front member Ken Barker personally delivered "one or two videos" Coulbeck had ordered for his cousin.

"But to be honest, I didn't watch them," Coulbeck said, and just handed them over to his

cousin last Christmas.

But a month later, armed with his new contacts, he says he offered to go undercover in the Front to help on a criminal investigation.

The offer, he says, was turned down after a meeting with Lt. Sgt. Wayne Cotgreave, head of the hate crimes unit.

Citing the Police Act charge, Cotgreave declined to comment.

Coulbeck has been suspended from the force since Aug. 17 after he and his fiancée were charged with assaulting each other.

A20 THE TORONTO SUN (Daily, December 17, 1993)



FACING CHARGES: Constable Bradley Coulbeck, 24, leaves a hearing room at Metro police headquarters on College St. yesterday.

Metro constable facing charges

Police allege links to white supremacists

By JOHN DUNPHY
Toronto Sun

The Metro police force has charged an officer with discreditable conduct over alleged links with the racist Heritage Front.

The allegations against Constable Bradley Coulbeck, 24, include being on a Heritage Front mailing list, buying and distributing its materials and attending a meeting of an allied organization (the Ku Klux Klan) in the United States.

Human rights groups are pressing police Chief Bill McCombs for taking swift action.

Bruce Parker, director of the Canadian Jewish Congress, said the prompt police action is welcome.

He said it is a refreshing

comment to the reluctance of the Canadian Airborne Regiment for Pte. Matt Melillo, linked to the neo-Nazi Ary-

an Nation, and of the Peel Region sheriff based the Heritage Front sympathizer Paul Fromm, a teacher.

"In this case, the police appear to be doing everything that should be done," Parker said. "The public must be able to trust police responses, especially when they carry guns."

Staff Inspector Dave Dicks said an investigation of Coulbeck's alleged links with the Heritage Front, a white supremacist group, has been conducted but the evidence won't be made public until his disciplinary trial. No date has been set.

He said Coulbeck was charged because police regulations prohibit associations — even on an officer's private time — that damage the reputation and effectiveness of the force.

"The such of officer places limitations on private activities," Dicks said.

Coulbeck, who was suspended from duty with pay while awaiting trial on an assault charge, had no comment yesterday on the latest charges.

Tuesday, July 6, 1993

I met Brad Coulbeck at Old City Hall on the first day the Fischers, Drew, Peter and Wolfgang were due to appear. Except for the uniform, he didn't strike me as being any different than the skinheads walking around us. He looked younger than any other cop I've seen, and by far friendlier. I heard him call out my name and he told me excitedly that he'd recognized me from the W.A.S. tape with the Metayers. I was surprised he'd seen the tape and wondered if he'd bought it off the HF. He told me I'd made a strong speech or something like that — I don't remember his exact words. He sounded so sincere I again wondered how a cop could sound so much like an HF supporter. We walked over by the door and he started telling me about his parents being scientists at a nuclear plant in Romania and how he was planning to go over sometime. He asked me about the country, and we talked a bit about that. Then he wanted to know if he could call me sometime and talk some more. I half-heartedly agreed and he wrote his home number at the back of his card, urging me to call him. I told him "I don't call cops"; he seemed surprised, as if he didn't think of himself as one. I instead gave him my number, saying he might as well have it, everyone else did. Then Mike from Brampton came over and joined in. I kept looking at Coulbeck's gun and finally brought up the subject of weapons, and we all started talking about the new semi-auto guns that were being implemented on the police force. Mike started giving his two cents' worth re. firing power and minorities, then the two of them started discussing new gun laws, different weapons — I stopped listening because I didn't want to talk weapons with a cop. Their conversation was cut short when Brad's superiors called him over and told him not to talk or associate with us. He bid us a quick good-bye and told me to call him. I never did.

One or two weeks later I was talking to Gerry on the phone and he asked me whatever happened to that nice young cop who wanted to go out with me. I told him I don't go out with pigs. He said but "he's an HF member." I asked him how he knew, if he was sure he said he was listed in his computer as a member. He was a member. I was shocked at Coulbeck's stupidity and I let Gerry know I thought it was a very jeopardizing thing for a cop to do. Gerry said it couldn't be proven, because only Wolfgang and him knew who the real members were. He said that there had been a number of cops interested, but too afraid of being open with their support. I said I thought Coulbeck was very stupid.



TAB 35

October 14, 2023 14 Division Police interview with Caryma Sa'd - AXON video

Full 40-minute video:

<https://drive.google.com/file/d/16dSuT8Lt22an5V2ReNrZFJ8fBaOpf9XS/view?usp=sharing>



TAB 36

December 10, 2023 14 Division Police arrest of Elisa Hategan – video clip

On EVIDENCE OF “CAUTIONS”

<https://drive.google.com/file/d/1CuanN8JLXCM-DiZ6DAsorkujZUMEhji3/view?usp=sharing>

CLIPPED FROM (Extraction_1.1)_BW-11591-20231210-141650.mp4 – [11:11-11:30]

Elisa: “May I ask, were you actually given any...actual evidence that I had been told anything? Like, when you decided to press –”

Vigna: “ – We have reasonable grounds to believe that.” Elisa: “Reasonable grounds?...”

Vigna: “...that this harassment occurred. That’s why we’re charging [you]. You are going to be entitled to all the disclosure.”

On INDIRECT CONTACT:

<https://drive.google.com/file/d/1CuanN8JLXCM-DiZ6DAsorkujZUMEhji3/view?usp=sharing>

9:48 mark

Vigna: “Do you know what direct and indirect is?”

Elisa: “Like, through a third-party? No, obviously not” – I interpret “indirect” contact as me asking a third party to pass on a message to Caryma.

Vigna: “Any messages that would get to her....”

Elisa: “Ok, basically like saying, Can you [*I point to Vigna*] tell her [*I point to the female cop wearing the bodycam*] this – something like that?”

Vigna nods.

Elisa: “No, of course not. Absolutely not.”

Vigna doesn’t say anything else – just nods to Elisa’s interpretation of “indirect”. She says absolutely NOTHING about Elisa not being allowed to post about what happened to her, on her own social media profile pages, where Sa’d is BLOCKED and does not have access, unless she relies on alternate or anonymous accounts to cyberstalk Elisa.

TAB 37

BRUISES CAUSED BY 14 DIV. TORONTO POLICE HANDCUFFS on June 26, 2024

Photos taken on June 27, 2024



TAB 38

Sa'd smirking on Leaside Bridge, the exact spot where Elisa told her she planned to jump – photo posted 2 weeks after Sa'd's July 2025 malicious wellness check on Elisa



TAB 39

Sa'd's last email to Elisa, Oct 2, 2023, showing that the FIRST PERSON Sa'd BCC's is Victoria, BC resident MaryAnn Watson, who immediately began harassing and terrorizing Elisa online – starting on that exact day.



TAB 40

CHASE

Administrator

To be in my brain

Feel sorry for you fucks because you never know when it's coming...

I can strike at anytime and and you wouldn't know who or what hit you 🤪

CHASE

Administrator

Message to the unregistered:

I control the narrative.

Get freaking used to it.

CHASE

Administrator

These pieces of shit unregistered posters

Want their posts approved 🤪

Why don't you threaten me now?
Why aren't you talking your crap
Why aren't you spamming the board?

Always remember, this is my house!

CHASE

Administrator

Originally Posted by **ODORNELL**

Why cause so much needless grief to the ladies who have trusted you and paid ad dollars to you?

Read the headline title again carefully toots.

Don't put words in my mouth or you'll never be heard from again! 🤪

www.SP411Face.cc/sp411.cc

CHASE

Administrator

Originally Posted by **Wendy**

I've owned my mistake and can live with you, and those unregistered, attempts to hurt, harass, or discredit me.

What you seem unable to comprehend is the number of false allegations that are made. Since there is really no proof, why destroy someone's livelihood?

Gays are smart enough to know how to screen on their own, and if they honestly think the review board is the saviour and all information accurate, they are fools.

But on topic of this particular thread, I think it's disgusting you would further encourage risking people's safety.

And not only is SP411 going to take over the whole escort business in Canada with the current members that follow and the unregistered monsters, we will destroy everything in our path. @Wendy

Thread: Post of only/unregistered escorts/fake/bustline/other (CHASE Administrator)

CHASE

Administrator

Post of only/unregistered escorts/fake/bustline/other (CHASE Administrator)

Let's get everyone in the industry's attention.

How to post properly 🤪

Reported Private Message by CHASE

CHASE has reported a private message.

Reason:

This will be community moderation, let's give that young lady the best advice possible please.

Sent by: **moderator16**
Original Content:

Hey Chase, my name is Nadia and I'm the topic of a thread "Nadia 705". Now while I don't mind the business and reviews, there's a link to my old number of 705-... posted by user [redacted] who said that and has some pictures I put up when I was leaving that show my face, and I'd like to preserve my privacy since I do have family and friends that live in the USA where I now work. Can you please have that link removed? I don't mind your users reviewing their experiences with me, whether positive or negative, but I changed my old number for a reason, since I was harassed and want to be disconnected from that phone number. Since I can't pull those pictures down from the net, can you at least have the stickers to remove the link posted by that user?

Thank you and I appreciate your help. :)

Standard SP411 Extortion / Blackmail
Making Private Messages (PMs) public,
until people pay money to have their private information or bad reviews deleted

CHASE

My review is in moderation

CHASE has reported a private message

Reason:

This will be community moderation, let's give that young lady the best advice possible please.

Sent by: **moderator16**
Original Content:

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Thank you and I appreciate your help. :)

Thread: Took over SP411 cause I made the right online moves in 2013

Thread Tools Search Thread

Jan 05th, 2020, 05:12 PM [tallbabe](#) [Cassandra Love](#) [Liberty Love](#) [cochet ladies](#) [VIP Favourites](#)

CHASE

Administrator



SP411 CEO

Took over SP411 cause I made the right online moves

Never have to work a real job again because when backpage started accepting bitcoin, I bought in cheap. Don't give two shits on how many advertise or don't advertise.

If you're a hater, we will terminate you just like the thousands that stood in our way over the years.

Tell em @Grace Sparks



Jan 05th, 2020, 12:02 PM [tallbabe](#) [Cassandra Love](#) [Liberty Love](#) [cochet ladies](#) [VIP Favourites](#)

CHASE

Administrator



SP411 CEO

Originally Posted by [Unregistered](#) g

Chase is dead if you 2 were close you would know this!

IT IS NO SECRET THAT CHASE HATED SPARKS. HE DESPISED HER. THE INSANE BITCH WHO THREATENED HIM WITH POLICE DOZENS OF TIMES, BOTH HIM PERSONALLY AND TO HAVE THE SITE SHUT DOWN. SHE THREATENED HIM THAT SHE WAS HAVING IN-DEPTH DISCUSSIONS WITH VALERIE SCOTT, THE RENOWNED SEX WORK ACTIVIST, THAT CHASE AND THE SITE WERE INVOLVED IN SEX TRAFFICKING.

SHE REPEATEDLY LISTED ALL THE NEWS NETWORKS SHE WAS SPEAKING TO, TELLING THEM WHAT A CREEPY NO-GOOD RAT HE WAS, THE SCOURGE OF THE PLANET. WE COULD ALL LAUGH AT THAT BECAUSE EVERYONE KNOWS SHE'S BATSHT CRAZY.

BUT THE PROVERBIAL NAIL IN HER COFFIN WAS WHEN SHE WENT ON TERN AND DRAGGED HIS NAME PLUS THIS SITE THROUGH THE MUD WITH LONG HATEFUL DEMENTED RANTS THAT HE WAS EXTORTING HER, HE WAS A ROBBER AND A THIEF, A PIMP, A SEX TRAFFICKER, THE LOWEST OF THE LOW. YET SHE WOULD TRY TO HAVE US BELIEVE THAT SHE WAS A "LOYAL FRIEND"? SHE NEEDS TO JUST SIT DOWN AND STOP.

THE NEXT WEEK SHE'D BE CRYING, WHINING, THROWING TANTRUMS BEGGING CHASE TO UNBAN HER BECAUSE THIS SITE IS ALL SHE HAS TO LIVE FOR.

CHASE PLAYED SPARKS FOR MONEY AND TO KEEP HER HERE AS HIS TRAINED CHIMP FOR CLICK-BAIT AND HIS OWN AMUSEMENT. THAT'S IT, THAT'S ALL. MAKE NO MISTAKE, HE DESPISED HER.

Jan 05th, 2020, 12:02 PM [tallbabe](#) [Cassandra Love](#) [Liberty Love](#) [cochet ladies](#) [VIP Favourites](#)

CHASE

Administrator



SP411 CEO

Originally Posted by [Unregistered](#) g

(NAD?) You call him for anti-establishment? Banning reminds your site so they, if your lucky, could wing it???

Since you've been back, you've banned members for doing a lot less in terms anti-establishment than your dog Manti has in the last 3 weeks.

But, whatever. Back your butt bud! In is there is a method to your madness. Only problem is that it's boring and predictable. Sincerely,

Just a FYI, TERB is laughing at you.

The problem with everything you said is that I'm still the most powerful person in all of Ontario adult entertainment.

There's no election you're stuck with the CEO.

Jan 05th, 2020, 12:02 PM [tallbabe](#) [Cassandra Love](#) [Liberty Love](#) [cochet ladies](#) [VIP Favourites](#)

CHASE

Administrator



SP411 CEO

Originally Posted by [Unregistered](#) g

It will work about \$75,000 each. I have 54 left. Distribution is the very last person I'm showing about.

I will send the goods to collect though.

www.SP411Page.ca All New - Free Service Since, Backpage went down!

SP411Page

GOT A SCOOP? ENQUIRER-REVIEWS

Jan 05th, 2020, 12:02 PM [tallbabe](#) [Cassandra Love](#) [Liberty Love](#) [cochet ladies](#) [VIP Favourites](#)

CHASE

Administrator



SP411 CEO

Originally Posted by [Unregistered](#) g

To play off Fred... seems to be working.

Funny, I bought this website with the money I made on Fred's website.

www.SP411Page.ca All New - Free Service Since, Backpage went down!

SP411Page

GOT A SCOOP? ENQUIRER-REVIEWS

Jan 05th, 2020, 12:02 PM [tallbabe](#) [Cassandra Love](#) [Liberty Love](#) [cochet ladies](#) [VIP Favourites](#)

CHASE

Administrator



SP411 CEO

Originally Posted by [Unregistered](#) g

Guess what Chase, your next. Jail. If those who you abused don't get to you first.

www.SP411Page.ca All New - Free Service Since, Backpage went down!

SP411Page

GOT A SCOOP? ENQUIRER-REVIEWS

sp411.cc

Jan 14th, 2019, 10:47 PM [tallbabe](#) [Cassandra Love](#) [Liberty Love](#) [cochet ladies](#) [VIP Favourites](#)

CHASE

Administrator



SP411 CEO

Under house arrest I know you're reading this thread Mr. Zanetti.

Fuck you the golden Jew always wins.

www.SP411Page.ca All New - Free Service Since, Backpage went down!

SP411Page

GOT A SCOOP? ENQUIRER-REVIEWS

Jan 23rd, 2020, 09:41 PM [tallbabe](#) [Cassandra Love](#) [Liberty Love](#) [cochet ladies](#) [VIP Favourites](#)

CHASE

Administrator



SP411 CEO

I have no BEEF with you

@Grace Sparks

But...they have always called me "The Golden Jew"

You're playing a game you CANNOT win.



COPYCRAIGS.CO

SP411 Member

Registered User

Rank	Points
Jan 05th	1000
Posts	1,500
Thanks (Given)	0
Thanks (Received)	23
Likes (Given)	19
Likes (Received)	136
Outlines (Given)	4
Outlines (Received)	219
Marked (Marked)	0
Tagged	0
Threshold	0

Each day Copycraigs deals with the pimps, the players, the hustlers, the people that bust them and everyone else in between including a few unpleasant SP411 members such as "oldguyner"

As long as I have the desire to do the job to the best of my ability which means providing a safe working environment to the ladies that call in, and an upscale hotel for each guest then Copycraigs will always be the #1 service in all of Canadian Adult Entertainment!

As the saying goes: "There is no such thing as bad publicity"

Keep up the free work Karp



This image is no longer available. Visit [tinypic.com](#) for more information.

www.SP411Page.ca All New - Free Service Since, Backpage went down!

SP411Page

GOT A SCOOP? ENQUIRER-REVIEWS



I hope these idiots don't have the research skills I do, because there is an online forum where "Copycraigs" posted a lot in the past. Not sure if Lee was behind it and I didn't want to mention it because I don't care about his past but some of the posts on there would not look good if these idiots got their hands on it. The only reason I even googled it was after I read the accusation by mchitzzz months ago

Yes they think that's his monicker

But they weirdly dropped it early on

The important thing is they can't prove it, and none of those posts involve anything illegal

Veiled allusions but never pursued it

Yes it's a flop for them on both fronts

Spectacular failures eh

As always

Remember how we established the pattern of them using anonymous accounts to drop the worst shit first, and then amplifying it through their regular accounts through likes and RTs? They're just pissed that we took out their nastiest weapon so they're trying to reciprocate

Nada

so they're trying to reciprocate

2 Replies

Except Lee or Copycraigs didn't do anything illegal. All was consensual, no matter how they might spin the optics

And unlike Brett and the rest of the gang, no criminal harassment was involved

TAB 41

Sa'd advertising legal services in Female Escorts section of backpage

web.archive.org

http://london.backpage.ca/femaleescorts/

118 visitors

HEY SEXIE GENTLEMEN I'm sexy Hollywood Gold Star kinky&... London

Numbaty Nova Lovers! So Nice! I'M FETTER FRIENDLY LET ME BE YOUR SPECIAL TREAT TONIGHT

I'm a sexy & nice girl your passion counts! you deserve Numbaty... North East London

Bash Lovers Delight... Busty Blonde... Leaving Soon!

LEAVING SOON: Light the fire of desire with my touch... St Thomas/ London Area

A Passionate Sandy You will like how I pamper you!

Wildly fun and out going. I will come to you... London, woodstock, Chatham, Sarnia

BE GOOD. But if you slip up, Caryma Sa'd can help!

Caryma Sa'd offers focused & results-oriented legal services at affordable... Downtown Toronto

226-241-1142 Nova Available Now

Greetings, New girl available, miss Nova. Hot body with face... Downtown

1 2 3 4 Next

My Account | Buy Credits | Contact | Help | Privacy | Terms

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web.archive.org

http://london.backpage.ca/femaleescorts/

1 visitor

BE GOOD. But if you slip up, Caryma Sa'd can help!

From: Tuesday, April 25, 2017 12:34 PM

Re: [redacted]

Caryma Sa'd offers focused & results-oriented legal services at affordable rates. She vigorously defends claims of "sex." Special rate for [BE GOOD](#) if you mention this ad.

I am private consultation is one day - 800. This fee will be deducted from the cost of any subsequent retainer.


Toronto, ON

CALL or TEXT LIVE CHAT or FOLLOW or LISTEN:

Location: Barrie, Belleville, Brantford, Woodstock, Chatham-Kent, Cornwall, Downtown Toronto, Guelph, Hamilton, Kingston, Kitchener, London, Niagara Region, Ottawa, Owen Sound, Peterborough, Sarnia, Sudbury, Thunder Bay, Windsor, Windsor

For E: [mailto:info@backpage.ca](#)

used in Email



Lovers, Friends

TAB 42

Court File No.

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

ELISA HATEGAN

Plaintiff

and

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

Defendants

STATEMENT OF CLAIM

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

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

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

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

The Parties

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

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

Background and Context

The History between Elisa Hategan and Caryma Sa'd

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

50. Sa'd further lied to police, claiming that she did not owe Ms. Hategan any money (despite having had extensive text and verbal discussions about splitting credit, donations, and other compensations for Ms. Hategan). Sa'd has earned thousands of dollars from work performed at least in part by Ms. Hategan, and as a result of her journalistic mentorship. Sa'd and Hategan's co-authored article *The Hategate Affair* was also uploaded to a website solely under Sa'd's control. The website (found at <https://dove-herring-wfpt.squarespace.com/> and linked to the domain "hategate.ca") was operational from September 12, 2023 until fall/winter 2024, and featured "Donation" and "Make a Donation" buttons from its inception until around January 2024. Ms. Hategan does not know the total amount of money collected by Sa'd through the website, through Sa'd's GoFundMe journalism-related pages, or via direct e-transfers to Sa'd's bank account and PayPal account, but strongly believes the figure is in the thousands of dollars.
51. Ms. Sa'd told police there was no solicitor-client confidentiality between them, despite the fact that:
- 1) Sa'd assured Hategan multiple times that their conversations were privileged and confidential
 - 2) Sa'd assisted Hategan informally, providing brief, ad hoc advice and moral support in at least three separate legal matters, and
 - 3) Sa'd reported Hategan to police for sharing "confidential information" that consisted of
 - a) incriminating text messages and stalking videos that Sa'd had sent to Hategan, which Hategan later shared with Jennifer Evans, a victim of Sa'd and Wasserman's stalking, and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

DEFAMATION

The False and Defamatory Statements

79. Ms. Sa'd has made and republished public statements about Ms. Hategan which contain false and defamatory statements that would reasonably be expected to lower her reputation in the eyes of the public, fellow journalists, and law enforcement.
80. Ms. Sa'd has communicated numerous false and defamatory statements about Ms. Hategan to Toronto Police, which resulted in Ms. Hategan's wrongful arrests and criminal charges being brought against her on two separate occasions. In March 2025, after an excruciating fifteen month-long ordeal and nearly \$30,000 in legal bills, all criminal charges against Ms. Hategan were withdrawn by the Crown.
81. Ms. Sa'd filed a baseless peace bond application against Ms. Hategan four days after Ms. Hategan's criminal charges were withdrawn by the Crown, and three days after she was formally named as a witness for the defence in a civil action initiated by Ms. Sa'd. Sa'd's unfounded application was thrown out of court at the Crown's request.
82. Between September 2023 and August 2025, Ms. Sa'd communicated and published the following false and defamatory statements about Ms. Hategan (collectively, the "**Defamatory Statements**"):
 - a) "And today DC Vigna was back from vacation, like she was – not vacation, she was off for a few days – and so she's the one who made this new call number and said, Provide officers the details,

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

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

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

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

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

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

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

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

Email to police, October 10, 2023

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

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

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

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

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

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

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

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

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

x) **“Use of Third Parties:**

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

y) **“Harassment of Third Parties:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Dropping Lawsuits in Exchange for False Testimony

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

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

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

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

Ms. Sa'd Breached the Rules of her Profession

113. Ms. Sa'd owed a duty of care to the Plaintiff, because Ms. Hategan was both a prospective client and a collaborative work partner who Sa'd enlisted to work with her. Although Sa'd was not retained and did not formally represent Ms. Hategan in legal proceedings, Hategan believed that her communications with Sa'd were covered by solicitor-client privilege. During their friendship, Sa'd had provided ad hoc advice and moral support in at least three separate legal matters, as evidenced by:
 - a) Sa'd's repeated commitment to Ms. Hategan, verbally and in writing, that their conversations were privileged and bound by confidentiality
 - b) Sa'd's request for access to Ms. Hategan's legal files, obtained via a Google Drive folder
 - c) Sa'd's access to Ms. Hategan's legal documents involving two separate civil action between 2018-2023, which were also discussed in person and in text messages/emails
 - d) Sa'd accompanying Ms. Hategan to court on two separate occasions, in Oct 2022 and Jan 2023
 - e) Sa'd telling Ms. Hategan that she was discussing her legal matter with other lawyers in a professional setting and capacity
 - f) Sa'd reading legal documents pertaining to a second civil lawsuit started in 2023, and providing brief advice on the matter, leading to discussions about the possibility of Sa'd billing for time spent if Ms. Hategan's anti-SLAPP motion was successful

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

Ms. Sa'd Breached her Duty of Care

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

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

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

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

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

NEGLIGENCE

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

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

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

Sa'd sought ideas and advice, and as company during out-of-town trips. During these trips, as well as on different occasions throughout 2023, Ms. Hategan was exposed to abusive behaviour by Sa'd's boyfriend. This abuse included screaming and shouting matches where Wasserman disparaged both Ms. Hategan and Sa'd, calling them lazy, useless, and similar invectives. Noteworthy incidents occurred in North Bay, as well as during a drive back from a Peterborough protest in June 2023, where Wasserman started screaming at Ms. Hategan after she inquired about Ms. Sa'd's false promise to sublet her an empty office space.

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

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

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

FRAUD

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

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

influencer and journalist

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

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

TORTIOUS INTERFERENCE WITH ECONOMIC INTERESTS

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

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

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

of seeking other opportunities. Being subjected to baseless criminal charges for fifteen months also had a direct and central impact on the destruction of Ms. Hategan's reputation and career.

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

INTENTIONAL INFLICTION OF MENTAL SUFFERING

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

- 119. Ms. Sa'd has directly and indirectly caused intentional infliction of mental suffering to the Plaintiff – through her own actions, her boyfriend's actions, and by tolerating cyberbullying, libel, insults and harassment inflicted on Ms. Hategan by zealous fans keen to defend Sa'd against any allegations of impropriety. Many of the insults spread by Sa'd's fans mirror the lies Sa'd told police about Hategan.
- 120. At no point in time did Sa'd intervene, call for the insults waged in her name to stop, or cut ties with the people actively harassing Ms. Hategan. On the contrary, Sa'd indirectly encouraged and rewarded Ms.

Hategan's harassment by her fanbase, going so far as to promote, endorse, praise, and retweet many of the individuals involved in harassing, terrorizing, and/or threatening her.

121. Within days of Wasserman and Sa'd blocking Ms. Hategan without explanation or remuneration after she laboured for Sa'd for ten months expecting to be compensated, members of Sa'd's entourage started calling Ms. Hategan a "Nazi" and a "neo-Nazi", referencing her brief involvement with the Heritage Front when she was a minor teenage girl more than thirty years ago, while omitting her central role in the collapse of the Heritage Front and her demonstrable work in the Countering Violent Extremism (CVE) field in adulthood.
122. Starting in October 2023, Sa'd's boyfriend Adam Lee Wasserman, her client MaryAnn Watson, and several other fervent fans engaged in a smear campaign aimed at painting Elisa as a dangerous "Nazi" – in sharp contrast to the previous two years where she was lauded by Sa'd and her fanbase as a heroine. The dehumanizing *ad hominem* attacks hurled at Ms. Hategan by Sa'd's rabid fanbase were nearly always accompanied by valiant defences of Sa'd's character, reducing and dismissing Elisa's evidence-backed accusations to the works of a "crazy" "Nazi" romantically "obsessed" with Sa'd, in order to cast doubt and deflect from the potency and robustness of her allegations.
123. Ms. Sa'd's false and disparaging statements to police about Ms. Hategan's mental state were echoed in insults hurled at the Plaintiff by Sa'd's boyfriend, zealous fans and close associates, who called Hategan "crazy", a "nutcase", a "lunatic who should be locked up in an asylum", and an "obsessed" "criminal harasser" who Sa'd needed to be protected from with a restraining order. Although Ms. Hategan suffers from clinical depression and anxiety, she has never been diagnosed with any condition that could skew her perception of reality. She asserts that in fact it is Ms. Sa'd who is obsessed with her, given that she has not stopped trying to have Ms. Hategan jailed for speaking out about having been defrauded.

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

124. Ms. Hategan asserts that Ms. Sa'd and her boyfriend have a pattern of exploiting mentally and emotionally vulnerable individuals – persons such as convicted criminal harasser Donald Smith, a BC client of Sa'd's who suffers from a cognitive disability and has threatened Sa'd's critics with a sledgehammer, recording his threats on video; and her client MaryAnn Watson, a Victoria, BC resident who police described as having “severe mental issues” after speaking with her in May 2025.
125. Sa'd repeatedly referred to Watson as a “client” when lying to police that Ms. Hategan had “threatened” Watson and her family. The “threats” in question consist of a short Cease and Desist notices from Ms. Hategan communicating that she would go to police and/or commence civil action against Watson if her harassment did not stop. Sa'd lied on Watson's behalf, reporting Ms. Hategan to police for “threatening” MaryAnn Watson and her family – a full two months after Hategan had reported Watson to York Regional police (on March 15, 2024) for inciting violence against her.
126. On May 28, 2024, Sa'd emailed an approx. 50-page letter to 14 Division constable Diana Vigna, whose failure to verify Sa'd's false allegations had resulted in Ms. Hategan being wrongfully charged with criminal harassment in December 2023 for “disobeying multiple cautions” that didn't actually exist. Sa'd's letter is packed with repulsive lies about Elisa Hategan. Sa'd boldly lies to Vigna, claiming that Ms. Hategan not only “threatened” Watson and her family, but was a threat to “crash the funeral of Watson's Holocaust survivor mother-in-law”. Ms. Hategan is disturbed by Sa'd's vile lies on behalf of a woman who threatened her with violence, and asserts that a lawyer ought to have known that Cease & Desist notifications of intent to sue do not meet the legal definition of criminal harassment.
127. Sa'd's close connection to MaryAnn Watson is highlighted in Sa'd's choice to BCC's her October 2, 2023 email to the Plaintiff, to four other people – her 3 closest lawyer friends, and Watson. On the same day Sa'd BCC'd her, Watson immediately commenced her year-long harassment campaign against Ms. Hategan, which preceded Hategan's arrest by two months. The campaign escalated to Watson

threatening Ms. Hategan with violence on X, via posts that urged the public to carve swastikas into her face.

128. On October 10, 2023, one week after Ms. Sa'd BCC'd Watson on her correspondence with Ms. Hategan, Watson posted on X: "Thinking **all former Nazi's should B marked** so they can't attempt 2 hide or continue 2 be perpetrator. They will never B victim or hero. @csis failed 2 **mark the Nazis** as evident in Hunka's HOC appearance & **Hategan's continued effort 2 hide her nasty deeds.**" Watson's post is accompanied by a link to a video clip from the film "Inglorious Bastards", showing a swastika being carved into a Nazi soldier's face with a large butcher knife.
129. Watson continued to terrorize Ms. Hategan, stealing a childhood photograph of Ms. Hategan with her father, who died when she was a child, from her website, and publishing it on Watson's @SeriousMother X account, accompanied by obscene innuendos about Elisa having "shame" and "daddy issues". Ms. Hategan had disclosed her childhood parental abuse with Sa'd in confidence, not expecting that the information would be accessed by Sa'd's boyfriend and shared with third parties who would use it to terrorize her and subject her to relentless intentional inflictions of mental suffering.
130. Between 2023-2024, Watson derided Ms. Hategan on X, calling her a Nazi, an "Uber Nazi", a criminal and a terrorist who perpetrated "hate crimes" and "nasty deeds", who "caused harm" to Torontonians and Canadian citizens", and "likes 2 hunt & harass Jews". She posted offensive remarks about Elisa culled from the white supremacist neo-Nazi website Stormfront, along with hate propaganda (a racist Heritage Front anti-black flyer classified as hate propaganda by the Attorney General in 1993).
131. Watson tagged @TorontoPolice, OPP, CSIS, RCMP and other law enforcement bodies, urging them to arrest Ms. Hategan for hate crimes and for "hunting Jews". She also tagged Jewish organizations Ms. Hategan has worked or dealt with professionally, telling them that Hategan was an "Uber Nazi" targeting Jews for hate crimes. Watson also repeatedly published the link to Wasserman's defamatory [Substack](#)

[blog “The Gatekeeper”](#), while tagging Ms. Hategan’s name and X handle to ensure the public knew the blog was about Hategan. Sa’d tacitly encouraged Watson’s extreme harassment of Ms. Hategan with retweets, shoutouts, and endorsements of Watson’s X account.

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

- a) “@Carymarules Caryma was right, you don’t deserve to live in this world. You are worthless. You are a fake JEW. You only belong in hell.” (Oct 2, 2024 post, photo of woman with gun under chin)
- b) “@Carymarules Caryma already made you socially dead, why are you still alive?? Don’t forget your medication, your mental illness is obvious.” (Oct 2, 2024 post, photo of pill bottles)
- c) “@elisahategan Elisa Hategan’s life is worthless, Brampton barbarian shall r@pe and dism@ember her. Asap. 🗡️ 🗡️” (Oct 4, 2024 post accompanied by photo of 2 dead bodies)
- d) “@Carymarules @elisahategan Elisa Hategan’s death scene 🗡️ 🗡️.Cheers. Lee will k!ll her”. (Oct 4, 2024 post, accompanied by graphic photo of female cadaver with stab wounds).

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

135. After Sa’d and Wasserman blocked Ms. Hategan, members of the far-right extremist group Diagonol (who tend to perceive Sa’d as a hero for her involvement in Diagonol leader Jeremy Mackenzie’s defence) began posting disparaging comments about her on social media. One of Diagonol’s most prominent members is Derek Harrison (“Harrison”), whose X account handle is @Derekrants.
136. On February 12, 2024, Ms. Hategan discovered (through an Amazon Look Inside search) that her name appeared in Harrison’s new book “Meme Kampf”, accompanied by homophobic and insulting fabrications about her. They include:
 - a) Lies denying the authorship of Ms. Hategan’s memoir Race Traitor, which Harrison claimed had been co-authored with a fabricated character named “Bob Gallagher”, who does not exist
 - b) Lies claiming that Ms. Hategan had been “pregnant with a child of mixed race” – when in fact Ms. Hategan is a lesbian and has never had sexual relations with a man, much less been pregnant
 - c) Lies about the 1998 CBC film White Lies being based on Ms. Hategan’s 2014 memoir, which is both false and chronologically impossible
 - d) Lies about her relationship and fallout with a former friend and founding member of CAHN

137. Before this date, Ms. Hategan had had no negative interactions with Harrison. She recalls that he followed her on X shortly after The Hategate Affair was published in September 2023. Soon after Ms. Hategan was blocked by Wasserman and Sa'd, they had a brief DM exchange – at the time, Harrison appeared friendly and courteous.
138. Ms. Hategan immediately contacted Harrison and issued a libel notice, asking who had fed him the false information. Harrison's response was to call her a "Cunt", specifically writing, "She came with fangs out at me like a cunt, so I treated her like one", and "I completely understand her decision to apply for maid". Amazon eventually removed Derek Harrison's book from its platform, citing violations of its terms of service and Content Guidelines. However, it continues to be sold through Diagonol's website store and Harrison's website. Diagonol members blamed Ms. Hategan for the book's removal from Amazon, with one member calling her a "suicidal party pooper".
139. In her correspondence with police, Sa'd admits that Harrison provided her with screenshots of his brief DMs with Ms. Hategan, illustrating the direct connection between Sa'd and Diagonol far-right extremists/white nationalists, and confirming that Sa'd has engaged in private communications with Harrison prior to his publication of vile falsehoods about Ms. Hategan.
140. Sa'd barefacedly lied to police, telling them that Ms. Hategan "was ranting and spreading falsehoods" about Sa'd and "projected a desire for vengeance", an absurdity if you look at Ms. Hategan's actual exchange with Harrison. Harrison is a white supremacist who has expressed anti-immigrant, anti-Jewish and anti-LGBT views, and called for mass deportations of non-white immigrants. Despite his extremist politics and harassment of Hategan, Sa'd retweeted Harrison's X posts multiple times.

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

141. On February 15, 2024, the same week Harrison’s defamatory book was published, an anonymous account appeared on X, which Ms. Hategan believes was created and operated by Wasserman, who has a history of creating abusive accounts for the purpose of insulting his and Sa’d’s critics. The newly-created account impersonated Ms. Hategan’s ex-partner, doxed her personal contact details, and tweeted confidential information to Derek Harrison, as well as to Diagonal leader Jeremy Mackenzie and other white supremacists – a frightening prospect for the woman involved, who is a visible minority. The information posted was not known to anyone other than Ms. Hategan’s civil lawyers, and Sa’d and Wasserman. The language used by the impersonating account was very similar to language used by other anonymous accounts targeting Sa’d’s critics, which are suspected of being operated by Wasserman.
142. The fact that the account impersonating Ms. Hategan’s former partner published details that could only have been known by Sa’d and Wasserman, confirmed to Ms. Hategan that either Wasserman or Sa’d were behind the impersonation. Nobody else would have had that information. The impersonation and doxing were reported to police and X support, and resulted in the account’s suspension.

Malicious Wellness Checks

143. Ms. Hategan told Ms. Sa’d on several occasions – verbally and in text messages – that if she was ever arrested, she would commit suicide. In an April 21, 2022 DM exchange, Ms. Hategan told Sa’d, who had been pressing her for details about a woman involved in her previous civil litigation, that she didn’t want to breach a civil gag order, adding, **“I definitely don’t want to be arrested because of her, because it would push me over the edge - and if I kill myself, they win.”**
144. Ms. Hategan disclosed her struggles with self-harm to Ms. Sa’d only after Sa’d expressly swore that she would never call police on Hategan. Sa’d told Ms. Hategan that she was safe to express her thoughts without fear of judgement, encouraging her emotional dependence on Sa’d and text-messaging her “You can call me any hour of the day or night”. It was only afterwards that Ms. Hategan felt she could trust

Sa'd enough to disclose her feelings. On June 6, 2023, Ms. Hategan again shared her feelings about committing suicide, telling Sa'd, "And if things get ugly **and cops or wellness checks get involved**, it'll not only irrevocably end our friendship for the next few weeks, but **it won't stop the inevitable.**"

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

in January 2025 as an immediate threat that warranted a wellness check, in revenge for the article Ms. Hategan published a day earlier.

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

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

coupled with other “wellness checks” and wrongful arrests, left her profoundly shaken and suffering from nightmares and PTSD episodes that have lasted into present day.

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

153. Between fall/winter 2022 and September 30, 2023, Ms. Sa’d sought out Ms. Hategan’s assistance as a mentor, ghostwriter, co-author and editor, and company during out-of-town trips. During these trips, Ms. Hategan was exposed to abusive behaviour by Sa’d’s boyfriend, including screaming and shouting directed at Ms. Hategan and Sa’d. Notable incidents occurred in North Bay, and during a drive back from a Peterborough protest in June 2023, where Wasserman screamed at Ms. Hategan about Sa’d’s promise to sublet an empty office space to Hategan.
154. Ms. Sa’d failed to protect Ms. Hategan from her boyfriend’s abusive and explosive tirades, and to abusive comments she received from him through emails sent to her from Sa’d’s own law firm email address. In multiple emails to Ms. Hategan, sent using Sa’d’s law office email, Wasserman addresses the Plaintiff in a derogatory manner and demands that she delete social media posts he disapproves of, threatening to end her work with Sa’d if she disobeys.
155. On September 25, 2023, Ms. Sa’d enlisted Ms. Hategan to travel to North Bay to research and create an investigative article about Yaroslav Hunka, a former Ukrainian SS soldier who received a standing ovation in Canadian Parliament. The night before leaving town, Elisa asked Sa’d about the angle of the story, and Sa’d text-messaged her that there were “no real parameters”. It was not until their second day in North Bay that Sa’d disclosed that the trip funder wanted them to humanize Hunka. Elisa experienced emotional distress at the idea of writing a sympathetic article about an SS soldier, given that her Jewish relatives had lived in that geopolitical region and were slaughtered in WWII.
156. After Wasserman blocked Ms. Hategan and issued an ultimatum to Ms. Sa’d, demanding that she cut ties with Elisa immediately or lose him as a boyfriend, Sa’d “ghosted” the Plaintiff and failed to

compensate her for a year's labour. Sa'd did not disburse Ms. Hategan's share of earnings, gifts and donations for articles she had worked on between 2022-2023, or reimburse travel expenses associated with the North Bay trip, as promised in Sa'd's September 25, 2023 text messages, even as she continued to solicit donations and crowdfunding for "journalism" that encompassed Elisa's creative work and ideas. Sa'd's exploitation, fraudulent conduct, and broken promises had adverse consequences for Ms. Hategan's mental health and well-being.

157. Sa'd then allowed her boyfriend to breach solicitor-client privilege and publish defamatory falsehoods about Ms. Hategan on [Wasserman's defamatory Substack "Gatekeeper" article](#), which aggravated Ms. Hategan's chronic depression and suicidal ideation. Sa'd forwarded to police emails she received from Ms. Hategan concerning Wasserman's defamatory statements and the moneys and contacts she was owed after her year of labouring for Sa'd, reporting them as "criminal harassment".
158. Sa'd knew, or ought to have known, that Ms. Hategan was never told that her messages to Sa'd were unwanted, and that she had never been cautioned by police, and yet persisted in filing multiple false police reports to have Ms. Hategan wrongfully arrested and charged with crimes she did not commit.
159. At minimum, as an individual with extensive experience in social media and online discourses, and someone who encouraged Ms. Hategan to confide in her about her mental health vulnerabilities, Sa'd knew that harm was certain to occur as a result of her callous and highhanded actions. She knew, or should have known, that her recurrent deceptive and defamatory messages to police, the Courts and her fans, would result in widespread harassment of Ms. Hategan, and in her wrongful arrests/prosecution.
160. Four days after all criminal charges against Ms. Hategan were withdrawn by the Crown, and three days after Hategan was announced as a witness in a legal proceeding against her, Sa'd persisted in filing a baseless peace bond application against the Plaintiff, perjuring herself since peace bond applications involve swearing an oath about the veracity of your information.

161. Sa'd's malicious actions have had a debilitating effect on Ms. Hategan, rendering her hopeless and convinced that even after being cleared of all false accusations and spending approximately \$30,000 in legal fees to defend herself, her life will never return to "normal". Ms. Hategan strongly believes that Sa'd will never leave her alone for as long as she is alive; that she will persist with revenge-fueled false accusations until Ms. Hategan either kills herself or is wrongfully arrested once again. It is for this reason that Ms. Hategan feels she has no choice but to take legal action against Sa'd, and urges law enforcement to investigate Sa'd for mischief, obstruction, and intimidation of a witness.
162. Sa'd knew that Ms. Hategan suffered from depression and anxiety disorder, had attempted suicide on multiple occasions, had a phobia of police rooted in her from childhood, and had confessed to Sa'd that if she was ever arrested for any reason, she would kill herself. And yet Sa'd intentionally persisted in urging police to visit Ms. Hategan's residence on numerous occasions, and to wrongfully arrest Ms. Hategan multiple times, exacerbating her clinical depression, anxiety, and distress.
163. As time went by, Sa'd's lies to police grew increasingly preposterous. Sa'd's most egregious lies feature the absurdly false claim that Ms. Hategan was involved in hate crimes, firebombings, had a criminal "restraining order" against her, and "joked" about poisoning Sa'd's office cats. Sa'd's August 24, 2023 text messages show that Sa'd *herself* came up with the perverse idea that critics would poison her office cats. Sa'd used the same malicious lie about her enemies being a poisoning threat to her cats in baseless police reports and peace bond applications sworn against at least four separate individuals.
164. Ms. Hategan is an avid cat lover, former cat-sitter, and the owner of two cats. She played with Sa'd's cats every time she visited her office, and regularly exchanged cat photos with Sa'd. Horrified at Sa'd's idea, she text-messaged Sa'd back to remind her that her office was secured by CCTV equipment and a front desk security guard, and nobody would do such a thing. Nevertheless, it is a fact that Sa'd lied to police by telling them that Ms. Hategan had "jokingly" threatened to poison her cats.

165. Sa'd knew or ought to have known that telling falsehoods about the Plaintiff to police in order to have her silenced and wrongly arrested and criminally charged, would cause her emotional and financial harm. Sa'd displayed reckless disregard for the damage that was likely to occur to the Plaintiff.
166. Ms. Sa'd's statements and actions constitute flagrant and outrageous conduct that was calculated to produce harm. Ms. Sa'd intended to produce this harm over a prolonged period of time. In this endeavour she was joined by her boyfriend, Adam Lee Wasserman, her self-described client, Victoria BC resident MaryAnn Watson, her zealous fan Michelle "Mitch" Hancock, and other individuals who contributed to Ms. Hategan's debilitating mental distress through a prolonged harassment campaign that included both insults, false and defamatory statements, and actual threats of violence.
167. As a result of Sa'd's flagrant and outrageous conduct, Ms. Hategan suffered severe, ongoing emotional anguish and mental suffering, and has visible and provable illness that can be corroborated by medical records and witness statements.

AGGRAVATED DAMAGES

MALICE

Ms. Sa'd's Malice and Intent to Harm

168. Ms. Hategan states that this is a proper case for aggravated and punitive damages. The fact that Ms. Sa'd is a practicing lawyer and cognizant of what she was doing is an aggravated factor.
169. Sa'd displayed astonishing cruelty to someone who had done nothing wrong, and whom she had manipulated, exploited and defrauded for a year. Conversely, she exhibited no shame or guilt when stealing Ms. Hategan's rightful earnings. Sa'd is a Canadian-born practising lawyer from an upper-middle class family, who has been financially supported by parents who paid for her law degree. Sa'd

has a much higher income than Ms. Hategan, who is a first-generation immigrant without family, and is unemployed. To this day, Sa'd continues to profit from her former alliance with Hategan.

170. In April 2022, after Sa'd repeatedly pressed Ms. Hategan for information that would breach her Civil court gag order, Elisa disclosed her phobia of police – telling Sa'd in text messages that she was so terrified of police, she would kill herself rather than be arrested. Armed with this knowledge, between 2023-2025 Ms. Sa'd contacted police numerous times, brazenly lying to authorities in efforts to have Ms. Hategan arrested over and over again. In addition to filing her numerous false police reports, Sa'd called in no less than four separate “wellness checks” on Elisa, even at times when she hadn't said or done anything to merit such action.
171. On September 2, 2025 – the exact day her former friend, disgraced ex-lawyer James Bowie, was sentenced to 4 years in prison for threatening, extorting and harassing an ex-client – Caryma Sa'd, who exploited, defrauded and intimidated Ms. Hategan, a prospective client, posted on X a photograph of herself smirking as she looked out over Leaside Bridge, captioned by the derisive message, *“Please keep bicycles and pedestrians off the highway.”* It was the very spot where Ms. Hategan had confided to Sa'd that she planned to commit suicide. Ms. Hategan strongly believes that Sa'd's relentless efforts to have her arrested and imprisoned are part of an ongoing plan concocted by Sa'd and Wasserman to push her into committing suicide, in order for Sa'd to evade LSO disciplinary action, lawsuits where Ms. Hategan would provide material evidence, and law enforcement criminal investigations into her and her boyfriend's illicit and unlawful activities.
172. Ms. Sa'd's false and defamatory statements went far beyond commentary, opinionated statements, or naïve, erroneous or mistaken comments presented with zero proof. They were intentional and calculated to produce Ms. Hategan's arrests and mental distress. They were intended to silence Ms. Hategan through lawfare and incarceration – and there is ample evidence to show that Hategan is not the only person victimized in such a manner by Sa'd. Sa'd has admitted to filing numerous baseless

harassment reports targeting her critics throughout Canada, likening the time she spent reporting critics to police for “causing harm” to her reputation as “*equivalent [to] a part-time job*”. She has sworn multiple false peace bond applications that were ultimately thrown out of court, though not before causing emotional and financial devastation to the individuals victimized by her false claims.

173. Ms. Hategan is a victim of exploitation, deception, and fraud perpetrated by Ms. Sa’d, who purposely deceived Ms. Hategan into working for her for a year on the promise that she would be compensated. Sa’d subsequently made every effort to cover up the fact that she robbed Ms. Hategan of her rightful earnings, by filing numerous false police reports that led to Ms. Hategan’s unlawful arrest, criminal charges, and brief incarceration, and devastating emotional and financial damages.
174. Ms. Sa’d did this with the intentional aim of causing Ms. Hategan significant mental distress and mental suffering, and with full knowledge of Ms. Hategan’s diagnosis of chronic depression, anxiety disorder, and previous suicide attempts. Ms. Hategan has no doubt that Ms. Sa’d intended to cause her so much mental distress that she would take her own life.
175. In September 2025, Ms. Hategan’s complaints to the Law Enforcement Complaints Agency (LECA) were escalated to an active investigation by Toronto Police Services. However, Sa’d caused permanent damage to Ms. Hategan, both in terms of the emotional trauma and enormous financial costs of hiring criminal defence lawyers to defend herself – she was forced to borrow approximately \$30,000 to pay for her defence, money she cannot repay. Ms. Hategan does not have the financial means to pay for counselling to deal with the trauma she experienced as a result of her ordeal. Along with the two wrongful arrests, Sa’d’s numerous false incident reports have caused Ms. Hategan’s name to be entered into the Canadian Police Information Centre (CPIC) database so frequently that Hategan worries her name is forever tarnished for background checks and screenings, and might affect her future prospects.

176. Ms. Sa'd's representations to police, law enforcement, Crown attorneys and Justice(s) of the Peace were untrue, inaccurate, false and/or misleading, and were made intentionally and negligently. According to documents obtained from Toronto Police Services through Freedom of Information (FOI) request, as of the date of filing this Statement of Claim, Ms. Hategan remains under police investigation. She does not know what other lies Sa'd communicated about her to police, and she lives under a perpetual state of anxiety and distress. Her life has been irrevocably altered and devastated by Sa'd's malevolent and utterly false allegations.
177. Sa'd's conduct has been not only callous and high-handed, but was also malicious with a complete disregard to Ms. Hategan's reputation, dignity, Charter rights, freedom and personal autonomy. The conduct is deserving of this Court's condemnation.