

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

CHRISTOPHER HUDSPETH and GEORGE SMITHERMAN

Plaintiffs

and

WILLIAM WHATCOTT, JONI WHATCOTT, ADAM ZOMBIE, BRIAN
ZOMBIE, CHRISTOPHER ZOMBIE, DOUGLAS ZOMBIE, EDWARD
ZOMBIE, FRANK ZOMBIE, XYZ CORPORATION, JANE DOES and
JOHN DOES

Defendants

PROCEEDING UNDER the *Class Proceedings Act, 1992*

AFFIDAVIT OF KARI SIMPSON

I, Kari Simpson, of the Township of Langley, in the Province of British Columbia, MAKE
OATH AND SAY:

1 I am a journalist with a strong interest in social policy and have worked with all levels
of government in the development of social policy. In my capacity as a journalist I am a
strong proponent of freedom of expression and the exercise of constitutional freedoms, and
the importance of protecting confidential sources from those who seek to suppress the
truth.

2 On August 13, 2016 I became aware of a \$104 million dollar class action lawsuit
launched by representative plaintiffs Christopher Hudspeth and George Smitherman against
William Whatcott and unidentified defendants who support the political activism of
Whatcott.

3 I located and viewed on the Internet the recording of a press conference held by
Douglas Elliott, counsel for the Plaintiffs, at the Parliamentary Press Gallery, a place
reserved for the announcement of political news.

4 Shortly thereafter I obtained and read a copy of the filed Statement of Claim in this
action.

5 I was troubled by what I believe are defamatory comments asserted as facts at the
Elliott Press Conference and repeated within the Claim. I believe this case is an abuse of
process, vexatious and could turn into a political show trial, if the attack upon the civil
liberties of Whatcott and his supporters are given credence. The defamatory commentary
includes the vilification of those who in any way support Whatcott to enable him to engage
in political protest and exercise his right to free speech.

6 When I heard Hudspeth speak, he stated that he wanted to “smoke out” Whatcott’s
supporters. I accepted his invitation.

7 On my own initiative I wrote to counsel Elliott on October 5, 2016, and identified
myself as a supporter of Whatcott. Attached hereto and marked as Exhibit A to this my
affidavit is a true copy of my letter dated and sent by email on October 5, 2016.

8 The opening paragraphs of my letter leave no room for doubt about my support of
Whatcott::

“My name is Kari Simpson. I write to inform you that I am an avid supporter of Bill
Whatcott. I am uncertain as to why you are ignorant of this fact. I suspect either you haven’t
done your due diligence, or you are betting on “Gay Privilege” to win what would be, in any
other case, a SLAPP suit.

Had you done your due diligence, you would have easily found numerous interviews I have
done with Mr. Whatcott, available on the Internet. You would have seen my name in his
book, *Born in A Graveyard*, and probably read my afterword and my comments, published on
the back cover. You would also know that I helped publish his book.

You would also be aware that I actively and very publicly encourage financial support of Mr. Whatcott as he defends his right to freedom of speech; and I also support many other efforts Mr. Whatcott engages in, as I believe they are matters of great public importance.”

9 I advised that I would be representing myself:

“As in the aforementioned Human Rights case, I will appear self-represented as a defendant to your claim—and in my countersuit against your clients and the numerous plaintiffs you claim to represent—a countersuit which will be filed within the time limit, after you serve me.”

10 I then advised counsel Elliott that he had a conflict of interest as he was a member of the Marcher Class:

“I note that you are a stickler for rules where others are concerned. I trust that you are clever enough to know that you are in a conflict of interest, and at best may have already compromised the serious accusations made by your clients and the classes of pride attendees—of whom you appear to be one. I trust that you will reconsider your representation in this matter, so that a complaint to the Ontario Law Society won’t be necessary. I don’t object to you representing yourself, if you want to single yourself out from all of the “classes” you have identified in this action, as it appears you qualify for a number of them.

I look forward to the opportunity to explore the plaintiff’s claims through the discovery process, and to expose the facts and provide the court with insights never before made available. I especially look forward to yours.”

11 I included information how to serve me with documents:

“Please ensure that you, or new counsel, consult me on all matters relating to scheduling, discovery etc., as I will have to arrange travel and accommodation to facilitate what will probably be a lengthy and time-consuming—but very informative—discovery process.

My address for delivery of all documents, including proper service of the revised Statement of Claim, is 22678-28th Avenue, Langley BC, V2Z 3B2. Email is CultureGuard@gmail.com. Please provide me with all related documents, including confirmation of pursuit of plaintiffs Prime Minister Justin Trudeau, Premier Kathleen Wynne and other members of all classes claimed for in your Statement of Claim.”

12 I concluded my letter repeating my support of Whatcott:

“You can acquire Mr. Whatcott’s book, *Born in a Graveyard*, on BillWhatcott.com. There you will find—in bold print—at least two of my many endorsements of Mr. Whatcott. The Internet will provide you with much more evidence of my active role in raising money for Mr. Whatcott.

In future, please refrain from making any further falsehoods about Mr. Whatcott’s “supporters,” the need to “smoke them out” or other nefarious characterizations that are untrue. Failure to do so will result in further legal action.”

12 On October 5, 2016 I sent a copy of Exhibit A to the special email address published by counsel Elliott’s law firm, Cambridge LLP, displayed on their website to solicit information from anyone about the Whatcott lawsuit.

13 To make sure the Plaintiffs were notified, on October 5, 2016 I pasted Exhibit A on the Facebook page of Hudspeth, who either removed it himself or had someone else do it several days later.

14 In addition, I sent out a media release with the headline, ***“\$104 million Pride Parade lawsuit gets a volunteer defendant.”*** Attached hereto and marked as Exhibit B to this my affidavit, is a true copy of my media release dated October 5, 2016.

15 I was contacted shortly after the media release was emailed out by a reporter from Lifesite News. Attached hereto and marked as Exhibit C to this my affidavit is a true copy of the Lifesite News Story that was published on the Internet on October 7, 2016, under the headline, ***“Radio host dares gay activists suing Christian “zombies” who crashed Pride: sue me too.”***

16 When I did not receive any form of reply from counsel Elliott I sent on October 18, 2016 a second written request by email to Elliott, and “team member” lawyer Chris Macleod, to add me as a defendant. I also attached my earlier letter of Oct 5, 2016 to the email. Now attached and marked as Exhibit D to this my affidavit is a copy of my letter of October 20, 2016 to counsel Elliott.

17 In Exhibit D, I stated:

“I informed you last week about my on-going support of Mr. Bill Whatcott, and as such that I am a “Jane Doe” referred to in your lawsuit and should be named as a Defendant in the Whatcott matter. I asked that you confirm receipt of my notice, and to ensure receipt I also posted my notice onto the Facebook page of your client—but so far you have failed to confirm such receipt.

I also appreciate that others have informed you that your designated email link to the Whatcott lawsuit doesn’t work, yet it remains broken after all this time. I also question why you wouldn’t have had that fixed by now if you are seriously engaged in pursuing this lawsuit—or are you merely using your suit to terrorize individuals?”

18 I concluded my letter with a request not to delay adding me as a Defendant:

“I trust that as an Officer of the Court, you wouldn’t callously abuse the justice system and use it as your personal bully tool. Ontario law protects individuals—and those Jane and John Does named in lawsuits—from such abuse. If you intend to pursue this matter, I suggest you amend your claim and add me, have me served, and provide me with the dates already set with the court.

Your procrastination compromises my ability to prepare, and I’m sure that’s how the court will view the matter.

If your client’s instructions are to exclude me from the case, please confirm this in writing, as I am certain Mr. Whatcott’s counsel would be most interested. Alternatively, if your client’s instructions are to withdraw the case, at this juncture your obligations as counsel require that you inform me as well. I trust you understand your responsibilities and culpabilities as a lawyer in matters such as this.

I appreciate that my last correspondence should have resulted in you removing yourself as counsel. Please respond and clarify your position—or serve me forthwith. If I don’t hear from you by Friday, October 21, 2016, I will make a complaint to the Ontario Law Society. You do not have the right to waste the time of Mr. Whatcott, his legal counsel, his supporters and most certainly the resources and time of the Court.

Mitigating the damages at this point might be worth consideration.”

19 On October 26, 2016, I finally received a response, dated October 25, 2016, from Chris Macleod, a partner in Cambridge Law LLP who stated, “the plaintiff decides who should be included as a defendant; therefore, our clients are not obliged to include you as a defendant” and “we have no evidence that you are a suitable defendant.” No attempt was made by anyone from Cambridge LLP to obtain from me any information about whether I

could identify as “suitable defendant” who also supports Whatcott. Attached hereto and marked as Exhibit E to this my affidavit is a true copy of that letter.

20 I sent copies of this exchange of correspondence to counsel for Whatcott, to keep them informed of my independent activities.

21 On November 7, 2016 I obtained copies of the Plaintiffs’ Motion Record, the Factum, and the Book of Authorities and examined the materials to do a fact check.

22 I was shocked that there is no mention in either the Factum or in the sworn Affidavit of Hudspeth contained in the Motion Record of my self-identification as a Whatcott supporter and my invitation to add me as a defendant.

23 The allegation, “no other means of identifying the unknown defendants,” contained in paragraph 4 of the factum, is untrue and misleading, as the plaintiffs’ counsel has chosen not to inform the Court of my serious attempt to be added as defendant, as one of Whatcott’s unknown Jane Doe supporters.

24 Paragraph 5 of the Factum is also misleading. It is obvious to me from counsel Macleod’s letter to me that the Plaintiffs are cherry-picking defendants and disguising their motives by posturing an adherence to the “principles of natural justice.”

25 Paragraph 8 of the Factum, which alleges, “whose identities are presently unknown to the Plaintiffs” is untrue, as my identity is known to both the Plaintiff Hudspeth and to his counsel Macleod.

26 Paragraph 3 in the sworn affidavit of Hudspeth is untrue. Hudspeth asserts:

“...John Does and Jane Does and a corporation that funded these activities, whose identities are presently unknown to the Plaintiffs.”

I self-identified as a Jane Doe defendant on Hudspeth’s own Facebook page, and he presumably would have been informed of my letters by his counsel.

28 I also have no idea why the Plaintiffs' application for disclosure of unidentified supporters is brought in Court when Plaintiffs' counsel have not exhausted all the avenues open to them and in particular, when they choose not to add me as a defendant, and withhold this important information from the Court.

29 I make this affidavit in support of Whatcott's response to dismiss the application for disclosure and for no improper purpose.

SWORN BEFORE ME at the City of Langley,)
In the Province of British Columbia, this 8th day of)
November, 2016)

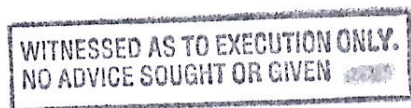
November, 2016

A Notary Public, in and for the
Province of British Columbia

Lee M Sawatzky
Lawyer

201 20353 64 Avenue
Langley, B.C. V2Y 1N5
604.530.5570


Kari Simpson



CHRISTOPHER HUDSPETH et al.
Plaintiffs

-and- WILLIAM WHATCOTT et al.
Defendants

Court File No. CV-16-558424- 00CP

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF Kari Simpson
(Sworn November 8, 2016)

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Tel:604.514.1614
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Douglas Elliot
Cambridge LLP
333 Adelaide Street West
4th Floor, Toronto, Ontario
M5V 1R5

Via: delliot@cambridgellp.com

October 5, 2016

RE: *Hudspeth v Whatcott et al*

Mr. Elliot,

My name is Kari Simpson. I write to inform you that I am an avid supporter of Bill Whatcott. I am uncertain as to why you are ignorant of this fact. I suspect either you haven't done your due diligence, or you are betting on "Gay Privilege" to win what would be, in any other case, a SLAPP suit.

Had you done your due diligence, you would have easily found numerous interviews I have done with Mr. Whatcott, available on the Internet. You would have seen my name in his book, *Born in A Graveyard*, and probably read my afterword and my comments, published on the back cover. You would also know that I helped publish his book.

You would also be aware that I actively and very publicly encourage financial support of Mr. Whatcott as he defends his right to freedom of speech; and I also support many other efforts Mr. Whatcott engages in, as I believe they are matters of great public importance.

You would also know that I share Mr. Whatcott's view about the Supreme Court of Canada. I have very publically stated—in my published works, including 2,500+ email notices to lawyers and judges—that Chief Justice McLachlin is a liar and a cheat, and exceeds her legal authority on matters before her court.

Like Mr. Whatcott, I speak with authority on these matters. I invite you to review the *Drive For Justice* video series available at DriveForJustice.com for more information. You should also be aware that although I have invited Chief Justice McLachlin to sue me if I am wrong, she has yet to do so.

I am no stranger to the tactics of those relying on Gay Privilege within the courts—as opposed to the rule of law. I also appreciate that the mainstream media routinely fails to report on important legal matters whenever the result

This is Exhibit "A." referred to in the
affidavit of KARI SIMPSON
sworn before me at LANGLEY BC
this 7 day of NOV A.D. 2016
A COMMISSIONER FOR TAKING
AFFIDAVITS FOR BRITISH COLUMBIA

exposes the antics of militant homosexual activists like Mr. Hudspeth and Mr. Smitherman.

Had you done your due diligence you would know that I, like Bill Whatcott, was hauled up before a Human Rights Commission. My little foray into the stacked quasi (so-called)-judicial arena took place in B.C., for distributing a document called the *Declaration of Family Rights*, which prohibited misinformation about homosexuality being distributed in the schools without parental notification—as per Ministry of Education policy.

Ironically, in that matter the sex activist complainants lost their enthusiasm when I agreed to go to tribunal, as opposed to settling with them.

The whole Human Rights process became a bit of a joke when I had to subpoena some of the complainants in the case to appear at their own hearing!

Once things got underway, I was able to cross-examine the complainants' first witness. The information extracted during cross-examination was indeed damning. The sex activists decided it was better to limit the damage already done, and they quickly withdrew

As in the aforementioned Human Rights case, I will appear self-represented as a defendant to your claim—and in my countersuit against your clients and the numerous plaintiffs you claim to represent—a countersuit which will be filed within the time limit, after you serve me.

I have had great success in exposing the antics of sex activists and have succeeded in educating many teachers, lawyers and law enforcement agencies about “Gay privilege” and the tactics used.

There is one more bit of business you must consider, Mr. Elliott: your own role as counsel on behalf of the class action. I have information which indicates that you participated in the 2016 Toronto Pride parade; and further that you have made public serious allegations about the misconducts of Black Lives Matter. These allegations include making public reference to their egregious behaviours, smoke bombs, causing medical distress to attendees... the list goes on. You have also declared that “homophobes”—I presume in your mind, people like Mr. Whatcott—have treated you better than the honoured Pride Parade participants Black Lives Matter. This is a transcript of a radio interview you did shortly after the parade about the Black Lives Matter sit-in:

Right. I think it is the most reprehensible thing I've seen.
I've been at every parade since 1981, and this is the
most disgusting disruption of the Pride parade. **So
homophobes have treated us better than these**

people did. Uh, it was a complete betrayal. Uh, I was— I'm very concerned about, you know, they brought smoke grenades to the parade. Imagine the people who are still reeling from Orlando seeing grenades being let off, and smoke. It must have been terrifying.

In addition to the numerous compromising and prejudicial matters that arise out of your declarations concerning the tactics of Black Lives Matter. Clearly there are other conflicts of interest that I will want to explore when we go to trial—and I'm certain that Mr. Whatcott's lawyers will as well—and that is your own participation in the parade; your involvement in the development of the highly contentious Dispute Resolution Process for parade participants; and among other matters, your letter of support for Brent Hawkes in the wake of his criminal charges involving indecent assault and gross indecency and a minor male. Additionally, there is your involvement in the latest EGALE propagandist spinout—the Just Society Report—specifically your advocacy contained therein of lowering the age of consent for anal sex, and health issues related to men having sex with men (and minor boys). As you are aware from your pleadings, these matters are directly relevant to the claims you have identified on behalf of those who have “mental distress” as a result of Mr. Whatcott and my support of him.

I note that you are a stickler for rules where others are concerned. I trust that you are clever enough to know that you are in a conflict of interest, and at best may have already compromised the serious accusations made by your clients and the classes of pride attendees—of whom you appear to be one. I trust that you will reconsider your representation in this matter, so that a complaint to the Ontario Law Society won't be necessary. I don't object to you representing yourself, if you want to single yourself out from all of the “classes” you have identified in this action, as it appears you qualify for a number of them. I look forward to the opportunity to explore the plaintiff's claims through the discovery process, and to expose the facts and provide the court with insights never before made available. I especially look forward to yours.

Please ensure that you, or new counsel, consult me on all matters relating to scheduling, discovery etc., as I will have to arrange travel and accommodation to facilitate what will probably be a lengthy and time-consuming—but very informative—discovery process.

My address for delivery of all documents, including proper service of the revised Statement of Claim, is 22678-28th Avenue, Langley BC, V2Z 3B2. Email is CultureGuard@gmail.com. Please provide me with all related documents, including confirmation of pursuit of plaintiffs Prime Minister Justin Trudeau, Premier Kathleen Wynne and other members of all classes claimed for in your Statement of Claim.

You should also ensure that your claim is amended to accurately state the words of the late Prime Minister of Canada, Pierre Elliot Trudeau, and first coined by the *Globe and Mail's* Martin O'Malley, concerning the state's involvement in the bedrooms of the nation. You fail to mention, like so many other sex activists when misusing this quote, that the elder Trudeau went on to say, referring to homosexuality: "When it becomes public, this is a different matter, or when it relates to minors, this is a different matter." I appreciate an accurate quoting of his borrowed declaration on matters involving the "...bedrooms of the nations", are damning for matters involving "public" events like Pride Parades and intergenerational sex, a.k.a. lowering the age of consent; but your contextual abuse of the words of Pierre Elliot Trudeau also disparages the former Prime Minister and deliberately seeks to misinform the court.

In closing, you are now aware that you and your clients have made serious assertions about me as a supporter of Mr. Whatcott. A number of these statements are demonstrably false and defamatory, and you have published them in a number of public forums. Be advised that my demand for an apology and restitution from you and your clients will follow forthwith.

You can acquire Mr. Whatcott's book, *Born in a Graveyard*, on BillWhatcott.com. There you will find—in bold print—at least two of my many endorsements of Mr. Whatcott. The Internet will provide you with much more evidence of my active role in raising money for Mr. Whatcott.

In future, please refrain from making any further falsehoods about Mr. Whatcott's "supporters," the need to "smoke them out" or other nefarious characterizations that are untrue. Failure to do so will result in further legal action.

Govern yourself accordingly,

Kari Simpson

Media Release –
FOR IMMEDIATE RELEASE, OCT. 5, 2016

This is Exhibit 'B' referred to in the
affidavit of KARI SIMPSON
sworn before me at LANGLEY BC
this 7 day of November A.D. 2016
A COMMISSIONER FOR TAKING
AFFIDAVITS FOR BRITISH COLUMBIA

\$104 million Pride Parade lawsuit gets a volunteer defendant

LANGLEY, BC October 5, 2016 — B.C.-based social activist Kari Simpson has been hiding in plain sight, but it seems that George Smitherman, Christopher Hudspeth and their legal counsel can't see her.

The homophobe-hunting trio who have launched a class action lawsuit on behalf of thousands of 2016 Pride Parade attendees—most of whom probably have no idea they are party to this suit, and can be counter-sued if the court sanctions the class action status the Plaintiffs are seeking.

Hudspeth has promised to “smoke them out,” referring to Whatcott supporters like Simpson. “It seems they’ve been blinded by their own smoke,” states Kari Simpson, who has battled and won numerous wars against sex activists who she says seek to legitimize “Gay Privilege” in our courts through misinformation, deception, hysteria and bullying tactics.

Simpson has not only been a long-time supporter of Bill Whatcott, she also shares his views of the Supreme Court of Canada—except her declarations go much further, include publicly stating that Chief Justice Beverley McLachlin is “a liar and a judicial cheat.”

Simpson’s first-hand knowledge of the corruption within the courts and CJ McLachlin’s callous disregard of the Rule of Law originated in a landmark case involving defamation—one that is far from over. Simpson has invited CJ McLachlin to sue her if she is wrong, but to date Chief Justice McLachlin has not dared. (For more information on this case go to driveforjustice.com.)

Simpson has [written](#) to the Plaintiff’s legal council in *Hudspeth v Whatcott et al* to inform him of her long-time support of Mr. Whatcott, and pointed out that as such, she should also be named in the suit.

Simpson also points out a troubling situation regarding Plaintiff's lawyer Douglas Elliott. It appears that Mr. Elliott may have already compromised his client's case by associating the political antics of Black Lives Matters as causing harm to 2016 Pride parade attendees, and publicly stating that the Pride Parade were better treated by "homophobes."

The suit alleges, says Simpson, that everyone attending the 2016 Toronto Pride parade was either harmed, terrorized or traumatized in some way by Whatcott's Gay Zombie Cannabis Users, who were allowed into the parade by the organizers, or by the political actions of Black Lives Matter. They are victims, whether they know it or not, including the Plaintiff's lawyer Douglas Elliott, who also participated in the parade.

Simpson has invited Elliott to reconsider his representation in the case, since his role appears to be more along the lines of a mentally distressed plaintiff who zealously engages in political activism, including campaigning to lower the age of consent for anal sex. Elliott is also the author of the Toronto Pride parade dispute process, and actively lobbies government on behalf of EGALE among other things—all issues and matters pertinent to this lawsuit.

Simpson believes that the Whatcott lawsuit provides an excellent opportunity to expose the antics of advocates of sexual anarchy, and says she looks forward to disclosure process—a process that should include Prime Minister Justin Trudeau, who is named as a Plaintiff.

Simpson says as a self-represented defendant she looks forward to the Prime Minister's responses to the questions she will have about the billions of dollars Canadian taxpayers spend on health and medical costs associated with men having sex with men—a point raised in the Whatcott lawsuit, because the flyer distributed by Mr. Whatcott at the parade contained references to the devastating diseases that have become epidemic among those associated with sodomy and multi-partner oral sex.

Simpson says that "while I believe that the state has no business in the bedrooms of the nation, that belief changes when those bedrooms begin to dig billions of dollars deep into the wallets of the nation. We have a multi billion dollar health crisis in Canada because a small, identifiable group chooses to be socially irresponsible. There is no social justice in that; and the time has come to have a progressive, fact-based, polite discussion about this reality."

The Whatcott flyers have succeeded in opening this long overdue discussion, albeit a judicial one. Ironically, says Simpson, the Plaintiffs—whether they know it or not—have kicked open a great big hornet's nest. It may be the government funded sex activist's organizations that will feel the sting the most, and they will have the homophobe-hunting trio of Hudspeth, Smitherman and Elliott to thank.

Link to *Simpson's Notice to Plaintiffs*

For more information or to contact Kari Simpson:

Email: Cultureguard@gmail.com

Tel: 604 514-1614



NEWS HOMOSEXUALITY
Fri Oct 7, 2016 - 9:52 am EST

Radio host dares gay activists suing Christian 'zombies' who crashed Pride: sue me too

VANCOUVER, British Columbia, October 7, 2016 (LifeSiteNews) — B.C. conservative firebrand and radio host Kari Simpson wants to be a co-defendant alongside outspoken activist Bill Whatcott in the \$104 million class action lawsuit filed against him by two prominent Toronto male homosexuals.

Simpson has released her open letter to the Toronto men's lawyer, Douglas Elliot, inviting him and his clients, Christopher Hudspeth and George Smitherman, to add her to the suit filed shortly after the recent Toronto Gay Pride Parade.

The suit is a class action on behalf three groups: all 500,000 in attendance; the 9,000 who marched in the parade, and the 500 who attended as supporters of the Ontario or federal Liberal parties, including Prime Minister Justin Trudeau and Ontario Premier Kathleen Wynne.

According to the suit, all were allegedly terrorized, defamed, or traumatized by Whatcott and a small group of supporters who gained admission to the event as "Gay Zombie Cannabis Users" presumed to be distributing condoms to parade goers. Instead, clad in green bodysuits, they handed out pamphlets condemning homosexuality in general and some politicians in particular while citing the Bible.

The lawsuit names Whatcott, wife Joni, and semi-anonymous participants bearing names such as "Brian Zombie" and "Christopher Zombie," as well as "Jane Does" and "John Does."

The Does are, according to Elliot, intended to cover "those who paid for his airfare or donated Aeroplan miles to get him to Toronto, those who put him up in Toronto, the people who paid to print the pamphlets, anyone who helped him in any way could be on the hook for \$100 million."

It is from the Does that Simpson wishes to emerge. Never a shrinking violet, the conservative radio host has sued and been sued over her outspoken opposition to homosexual propagandizing in the public schools, and she has called Chief Justice Beverley McLachlin a liar and offered a \$10,000 reward to anyone who can prove she isn't one.

Simpson is daring the Toronto Gay Pride plaintiffs to sue her too, though she won't say in what capacity she helped the Gay Zombies. If she is named, she can countersue during the lengthy initial phase of a civil action called Examination for Discovery, and acting as her own lawyer, she can interrogate the plaintiffs themselves under oath.

She says she especially looks forward to questioning Trudeau, who has agreed to be a named plaintiff, "about the billions of dollars Canadian taxpayers spend on health and medical costs associated with men having sex with men."

She is also eager to question Elliott about what she sees as a conflict of interest because his parade attendance places him among the unnamed plaintiffs and also about his "letter of support for Brent Hawkes in the wake of his criminal charges involving indecent assault and gross indecency and a minor male." Hawkes is a clergyman and homosexual activist facing charges dating to the 1970s.

This is Exhibit "C" referred to in the
Affidavit of KARI SIMPSON
Sworn before me at VANCOUVER BC
this 7 day of OCT A.D. 2016
A COMMISSIONER FOR TAKING
AFFIDAVITS FOR BRITISH COLUMBIA

Simpson wants to further question Elliott about his involvement in the recently released "Just Society" Report, "specifically, your advocacy contained therein of lowering the age of consent for anal sex, and health issues related to men having sex with men (and minor boys)."

Simpson informed Elliott in the letter: "I am no stranger to the tactics of those relying on Gay Privilege within the courts — as opposed to the rule of law. I also appreciate that the mainstream media routinely fails to report on important legal matters whenever the result exposes the antics of militant homosexual activists like Mr. Hudspeth and Mr. Smitherman."

"I note that you are a stickler for rules where others are concerned." She continues, "I trust that you are clever enough to know that you are in a conflict of interest, and at best may have already compromised the serious accusations made by your clients and the classes of pride attendees — of whom you appear to be one."

Elliott's law firm Cambridge LLP did not respond to LifeSite's request for an interview.

Kari D. Simpson
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Tel:604.514.1614
Email: CultureGuard@gmail.com

Douglas Elliott
Cambridge LLP
333 Adelaide Street West
4th Floor, Toronto, Ontario
M5V 1R5

This is Exhibit "D" referred to in the
affidavit of KARI SIMPSON
sworn before me at LANGLEY BC
this 7 day of NOV A.D. 2016
[Signature]
A COMMISSIONER FOR TAKING
AFFIDAVITS FOR BRITISH COLUMBIA

Via: deliott@cambridgellp.com

October 18, 2016

RE: *Hudspeth v Whatcott et al*

Dear Sir,

I informed you last week about my on-going support of Mr. Bill Whatcott, and as such that I am a "Jane Doe" referred to in your lawsuit and should be named as a Defendant in the Whatcott matter. I asked that you confirm receipt of my notice, and to ensure receipt I also posted my notice onto the Facebook page of your client—but so far you have failed to confirm such receipt.

I also appreciate that others have informed you that your designated email link to the Whatcott lawsuit doesn't work, yet it remains broken after all this time. I also question why you wouldn't have had that fixed by now if you are seriously engaged in pursuing this lawsuit—or are you merely using your suit to terrorize individuals?

If it helps, Mr. Elliott, I have an in-house tech support team that could help you fix that problem.

At this time please thank your clients for drawing me into this matter. I'll be making several Freedom of Information requests to various government offices as a result of reviewing the numerous videos online, and researching groups associated with the Toronto Pride Parade 2016. I trust that you agree that the Toronto Pride Parade is a show, and as such has legal obligations.

I am uncertain as to whom you intend calling, but I look forward to the naming of

the Special Constable driving the "Special Constable" police cruiser in the parade, who seemingly waited patiently while what appears to be a Pride Toronto volunteer repeatedly simulated lewd sex acts on the windshield of the cruiser as another volunteer recorded the shows. Then there are all those naked people—I think the guy in the parade only 10 feet from the Special Constable will be interesting to depose—as well as the officer.

Of course the fallout to other Pride participants (e.g., "TNT Men") as a result of you and your clients continues. I have sent a Freedom of Information request to obtain information on how the exclusive use of a community swimming pool was acquired for TNTmen. The Facebook promotion of this ongoing event includes pictures of several naked men engaged in what appears to be behaviour that leads to numerous known medical and health consequences including raising rates of throat cancer, syphilis, HIV and numerous other diseases that cost taxpayers billions of dollars as a result of men having sex with men. I wonder if this activity is socially responsible?! The Facebook ad, featuring a group of naked men in a swimming pool with some between the legs of other men, is promoting a naked swim events in a taxpayer funded swimming pool for a "Sex Positive" meet-up for TNTmen and male "students." This particular on-going event occurs at the Harrison Community pool in Ontario. You can appreciate how valuable Mr. Whatcott's health related information is when you consider the risk these men are engaging in.

In anticipation of my name being added, please ask your client, Mr. Hudspeth to retain all records associated with his 3 year "support" of the Black Eagle Kennel Klub, the organization that facilitates meet-ups and events for men dressed up as dogs and engage in "puppy play." These activities have rules like, "Anally inserted puppy tails must not be manipulated during play..." Of course this rule changes if the "pups" or their "trainers" want to move their "play" to the "dark room." I can image that exploring the disturbing mental health related problems you claim Mr. Whatcott, his fellow Zombies and Whatcott supporters have inflicted upon parade participants, like the Kennel Klub members, will be a very interesting aspect to this case. Do these puppy loving playful guys know your clients have given them a starring role in this lawsuit? I have reviewed numerous images involving this groups participation in the 2016 Pride parade and will have questions about Mr. Hudspeth's knowledge, engagement and support of this group, their members, licenses, permits and their activities in the "mosh" pit, the "dark room" and the "special arrangement" your client accommodated them with.

You should also know that it is not worth wasting your time trying to purge the Internet of incriminating evidence. As previously mentioned, my tech team is not only capable of fixing your email woes; they are great at finding and preserving data of all kinds.

Mr. Elliott, as you know, creating time to accommodate the important matters associated with this suit requires me to block time from my very busy calendar.

Your refusal to either acknowledge me as a supporter of Mr. Whatcott—and serve me—or to inform me otherwise, has resulted in me having to block time to accommodate the “just in case” scenario. Of course, this means hardship for me—and those hardships will be reflected in the damages I will seek in my countersuit against your clients.

I trust that as an Officer of the Court, you wouldn’t callously abuse the justice system and use it as your personal bully tool. Ontario law protects individuals—and those Jane and John Does named in lawsuits—from such abuse. If you intend to pursue this matter, I suggest you amend your claim and add me, have me served, and provide me with the dates already set with the court.

Your procrastination compromises my ability to prepare, and I’m sure that’s how the court will view the matter.

If your client’s instructions are to exclude me from the case, please confirm this in writing, as I am certain Mr. Whatcott’s counsel would be most interested. Alternatively, if your client’s instructions are to withdraw the case, at this juncture your obligations as counsel require that you inform me as well. I trust you understand your responsibilities and culpabilities as a lawyer in matters such as this.

I appreciate that my last correspondence should have resulted in you removing yourself as counsel. Please respond and clarify your position—or serve me forthwith. If I don’t hear from you by Friday, October 21, 2016, I will make a complaint to the Ontario Law Society. You do not have the right to waste the time of Mr. Whatcott, his legal counsel, his supporters and most certainly the resources and time of the Court.

Mitigating the damages at this point might be worth consideration.

Govern yourself accordingly.

Kari Simpson

SENT VIA EMAIL TO (CultureGuard@gmail.com)

October 25, 2016

Kari D. Simpson
101 22678-28th Avenue
Langley, BC V2Z 3B2
Tel: 604.514.1614
Email: CultureGuard@gmail.com

This is Exhibit "E" referred to in the
affidavit of KARI SIMPSON
sworn before me at Langley BC
this 7 day of Nov A.D. 2016
A COMMISSIONER FOR TAKING
AFFIDAVITS FOR BRITISH COLUMBIA

Chris Macleod, 647.346.6696
(Direct Line)
cmacleod@cambridgellp.com

Dear Kari Simpson:

Re: Christopher Hudspeth et al. v. William Whatcott et al.
Court File No.: CV-16-558424-00-CP
Our File No.: 1602326

We are in receipt of your letter dated October 18, 2016 addressed to Mr. Elliott.

Thank you for informing us that the email link to the Whatcott action is not functioning correctly. I will forward your concerns to our tech support, who will act accordingly.

Please be advised that for the purposes of this class action, and particularly, the tort of civil conspiracy, the fact that you have supported and/or funded Mr. Whatcott's activities in the past does not make you in any way a co-conspirator or a defendant in this action. Our class action only pertains to activities surrounding the Toronto Pride Parade 2016. At this time we do not have sufficient evidence to conclude that you are a suitable defendant in this proceeding.

If you provided funding to Mr. Whatcott or the Gay Zombies Cannabis Consumers Association in relation to the Toronto Pride Parade 2016, please provide evidence of such assistance so that we can determine whether to proceed with including you as a defendant in this action.

Under Ontario law, the plaintiff decides who should be included as a defendant; therefore, our clients are not obliged to include you as a defendant or serve you with any material in relation to this action.

At present, we have no evidence that you are a suitable defendant. Mr. Whatcott has refused to reveal the identities of anyone who assisted him in relation to his activities at Toronto Pride Parade 2016 and we will be addressing the issue of the identity of his co-conspirators with the court.

With respect to your allegations pertaining to Mr. Hudspeth's alleged support of the Black Eagle Kennel Klub, my client is under no obligation to produce any records pertaining to the same and will not take a position with respect to these allegations. Your claims regarding same are irrelevant to this action. I reiterate; this claim is limited to Mr. Whatcott's activities pertaining to the Toronto Pride Parade 2016 and any assistance he received in relation to the Toronto Pride Parade 2016.

Again, since you are not a party to this proceeding, we are not obliged to respond to your correspondence or demands. Any time spent in anticipation of being included as a defendant and any damages arising therefrom are incurred at your own risk and expense.

You are not obligated to respond to this letter; however, if you choose to do so, we advise that you obtain legal counsel before responding.

We trust the foregoing is satisfactory to you.

Yours very truly,

CAMBRIDGE LLP

Per:

A handwritten signature in black ink, appearing to be 'CM', written over the word 'Per:'.

CHRIS MACLEOD

CRM/jk