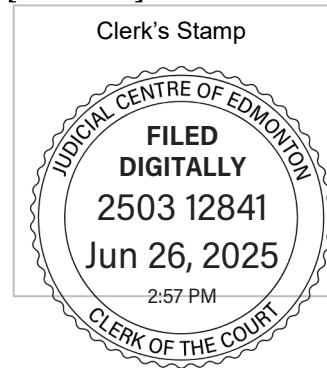


Form 10 [Rule 3.25]

COURT FILE NUMBER

| | |
|-----------------|-------------------------------------|
| COURT | COURT OF KING'S BENCH OF ALBERTA |
| JUDICIAL CENTRE | EDMONTON |
| PLAINTIFF | MARTIN LAWRENCE |
| DEFENDANT | MATHEW OGNESS |



DOCUMENT **STATEMENT OF CLAIM**

**ADDRESS FOR SERVICE
AND CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT**

EMERY JAMIESON LLP
Attention: Grayson J. Bateyko
2400, 10235 - 101 Street
Edmonton, Alberta T5J 3G1
Tel: 780-970-6298; Fax: 780-420-6277
File: 36776.0001

NOTICE TO DEFENDANTS:

You are being sued. You are a defendant.

Go to the end of this document to see what you can do and when you must do it.

Statement of facts relied on:

Preliminary Matters

1. The Plaintiff, Martin Lawrence (“the Plaintiff”) is an individual residing in the City of Edmonton, in the Province of Alberta.
 2. The Defendant, Mathew Ogness (“the Defendant”) is an individual residing in the City of Edmonton, in the Province of Alberta.

The Defamatory Conduct

3. The Defendant has made the following untrue and harmful statements, among others, online publicly regarding the Plaintiff, as well as has incited, assisted, and/or encouraged others to do the same. The Defendant has done so using the screen name “OgNasty” by publishing these statements publicly on the internet to many users of the internet in Alberta and/or elsewhere throughout Canada and the world. The Plaintiff uses the screen name “Vod”. These statements made by the Defendant about the Plaintiff are untrue, malicious and defamatory.

Extortionist

4. December 9, 2019: “Some window licking forum users with OG Derangement Syndrome and no access to any private information surely aren’t going to find some smoking gun the SEC missed.”
5. November 14, 2023: “Know VOD is a pathetic extortionist wannabe and people like LoyceV that try to give them a platform are even more weak and pathetic.”
6. November 15, 2023: “Vod, I have put up with your nonsense for far too long. Much longer than any person would expect me to. Still, you continue to spread lies about me for some strange reason.”
7. November 16, 2023: “The extortion message you sent me is available for anyone to read here...People can decide for themselves if they think that is a (pathetic) extortion attempt or not. Not to mention all the other nonsense ratings you’ve left me which I believe amount to libel and would get you in hot water if I felt like it mattered enough to care. You can see in my trust settings that I don’t trust DT and haven’t for years, primarily because there are members there that trust you, even after the constant provable lies, harassment, and extortion attempts.”
8. February 2, 2024: “I have zero tolerance for made up lies regardless of if it’s the “best” member of the forum spreading lies or the most mentally ill. A liar is a liar.”
9. February 29, 2024: “Just check my negative trust ratings for example, all of those users who have left those lies should be removed from the trust network by anyone in this community who has any honor or sense of decency. Failure to do so only allows people to damage the reputation of honest makers in order to push their scams on the community of members they’ve befriended, which is exactly what we’ve been seeing here over the last several years. It’s why we keep seeing respectable makers leave here and a majority of new projects end up being scams.”
10. March 6, 2024: “OP’s post is even merited by a user who includes a proven extortionist in his trust network.”
11. March 9, 2024: “It’s less about him being thick-skinned and more about him hoping people will do the right thing and keep these insane wannabe extortionists out of the DT network. So he has a negative trust rating until people like you grow a pair and start acting like men instead of cowardly little dishonorable weasels.”
12. March 11, 2024: “Don’t be a total dick or spread lies about people if you want them to read what you have to say.”
13. March 14, 2024: “I’ll paraphrase. I was doxxed by a user. Merit sources merited that user’s post doxxing me. Now I’m being extorted by that user and default trust members are including him in their trust networks.”
14. April 14, 2024: “I wonder if tackling extortion is on the to-do list now that money laundering appears to be taken care of.”

- 15.** April 16, 2024: “Confirmed and documented extortionists probably should be in the list either. Same with those that include confirmed extortionists in their trust lists. Now that openly advertising money laundering is being banned here, maybe extortion and those who enable it will be looked at next. Many DT members couldn’t be trusted with a BTC, let alone guiding other on who is trustworthy...”
- 16.** June 5, 2024: “On a forum, truth matters. That’s why it’s insane to me that the literal trust network here has a liar and manipulator at the top. Indeed we all have a long way to go if truth is the goal.”
- 17.** August 9, 2024: “Unfortunately, there are people here with petty grudges that use the trust network to punish people who don’t share their views. The real question is why does the Administrator allow confirmed and documented extortionists as well as those who support them into default trust to undermine the trust network.”
- 18.** September 21, 2024: “LoyceV is a spineless weasel who supports extortionists and spreads lies. Amazing that people look the other way at his behavior. You would be wise to never trust him with your BTC.”
- 19.** April 9, 2025: “Indeed, extortion and leaving unwarranted trust is the MO of some people here. I’ve still never been given an apology for the lies told about me or the extortion attempt which is not only clear and documented, but a further example of the lies this user tells. I’ve learned you can’t hate a retard for being retarded though. It is the people who include liars and extortionists in their trust network that are the problem. Not some mentally ill dude who clearly meets the definition of retardation as a result of a life altering medical problem.”
- 20.** May 10, 2025: “No new services even bother posting threads here anymore because of the environment that has allowed trolls to take over the forum and spread lies about anyone that doesn’t kneel to their extortion attempts. How is the most trusted DT member in here standing up for a confirmed extortionist? He has to, or else the mentally ill will target him, and he doesn’t have the testicle fortitude to do anything about it but be a bitch and support the harassment of others in hopes it spares him. This is the state of the website nowadays. Cowards pretending to be the moral police while cowering to mentally ill idiots who attempt to extort others and can’t even wipe their own ass.”
- 21.** May 13, 2025: “People were making hundreds of posts full of lies about me and claiming I stole something that I didn’t.”
- 22.** May 14, 2025: “People don’t even get banned for doxxing here. You can literally dox someone, attempt to extort them, spread lies about them, try to have them robbed or killed, and the Administration will urge forgiveness.”
- 23.** May 14, 2025: “I wouldn’t comment at all about this trash but I am tired of the lies being repeated and from this thread it seems people are believing the lies so I want to make one point perfectly crystal clear since theymos doesn’t seem to care people are trying to ruin my reputation with lies but instead decided to not trust me for sharing the truth.”

Mentally Ill

- 24.** November 14, 2023: "If you think I've spent two seconds caring about you outside of calling you a mentally ill idiot on these forums then you are mistaken."
- 25.** November 14, 2023: "Just to be completely clear on the subject for anyone who might be unaware that you are a habitual liar. You are a mentally ill wacko who is obsessed with me for some unknown reason."
- 26.** November 15, 2023: "No idea why Vod is back on his weird shit. Still, he continues to spew his libel. Mental illness is real folks and Vod is a prime example."
- 27.** December 23, 2023: "It's a shame that I could be retaliated against for defending myself from an extortion attempt, but I understand that people don't want to read through the mess that literally gave the troll perpetrating it a stroke. I think its pretty obvious that "feud" was just me being attacked by a mentally ill troll and even the Administrator of this site doesn't trust him while they trust me...Regardless, that seems more of a reason to ignore me than to try and retaliate via the trust system even if you do wrongly believe I was involved in anything other than the target of an extortion scheme."
- 28.** January 24, 2024: "No court would listen to this "case" because it is a clear case of a mentally ill person fabricating things in their head. It's a matter of a mentally ill person needing to get help. One side of the "feud" is mentally ill and acts like this is a life or death issue. I am sorry the forum has to be subjected to this public display of mental illness."
- 29.** January 25, 2024: "I've offered a better plan, its just that "policing" this form gives people with a god complex a hard-on and they've spent unimaginable amounts of time manipulating the trust network to get into power. [...]especially when it's clear that mentally ill users have found their way into DT due to malicious support from spineless members. It trickles down, chases away talent, and darkens the atmosphere here by the day."
- 30.** February 1, 2024: "When you stand up for yourself you end up with negative trust rating and constant harassment even if you did everything 100% correctly. You'll end up being harassed in ways you can't imagine by mentally ill people around the globe."
- 31.** February 8, 2024: "He didn't live up to his threat to blackball the mentally ill guy from DT for his trust abuse. He set me up with making me an original DT member, asking me to keep the default trust network honest and then empowering the evil I was keeping out of DT, unleashing an army of trolls my way...The mentally ill guy is mad at theymos for what?"
- 32.** February 8, 2024: "If someone was leaving someone else a negative trust rating based on lies they were attributing to me I wouldn't include them in my trust network, but I'm not a dishonorable bitch like you are. Anyone can research that you support the extortion attempts of me being made via the trust network. I don't respect liars or bitches who hide behind others to do their dirty work, especially ones who stand behind the mentally ill and use them as a human shield."

- 33.** March 10, 2024: "I understand he has mental issues as a result of a brain injury. You can't really blame a mentally handicapped guy for acting retarded, but you can cast shame on those who try weaponize someone's mental illness against people who hurt their feelings."
- 34.** October 9, 2024: "Some mentally ill wacko became obsessed with me and blamed me for him being broke and disabled in spite of us having no dealings whatsoever with each other. Then he said and did whatever he could to try and slander me (I guess he still is, lol)."
- 35.** April 23, 2025: "Sure, there are an overwhelming number of crazy people and I'll even say mentally ill users on this site. In fact, I'd say the crazy, worthless, and mentally ill became the majority here sometimes back in 2018. Anybody can point out a mentally ill crazy person here."
- 36.** May 12, 2025: "That led to him having to support extortionists and others who are obsessed with gaining control of the trust network. He's been compromised for a long time now and is honestly a weasel using mentally ill people on the internet like attack dogs."

Pedophile

- 37.** April 9, 2025: "Indeed, extortion and leaving unwarranted negative trust is the MO of some people here. I've still never been given an apology for the lies told about me or the extortion attempt which is not only clear and documented, but a further example of the lies this user tells. I've learned you can't hate a retard for being retarded though. It is the people who include liars and extortionists in their trust network that are the problem. Not some mentally ill dude who clearly meets the definition of retardation as a result of a life altering medical problem. I have to justify my statements based on real quotes from you to avoid potential lawsuits, like when I say you're a pedophile."

Miscellaneous

- 38.** June 5, 2023: "All I can really say about that is it is a bit disgraceful that so many default trust members include users like Vod in their trust networks who publicly tried to extort me. As with everything nowadays, corruption at the highest levels."
- 39.** June 6, 2023: "I can't imagine any sane person putting up with the harassment I've received from forum members here on and outside this forum, yet here I am."
- 40.** February 2, 2024: "If they knew the full extent of your supported extortion of me I suspect they wouldn't. One of us promotes money laundering, makes false claims, is obsessed with cornering the trust network, & supports extortion attempts;"
- 41.** March 7, 2024: "People are obsessed with adding negativity to this site. The last thing the people who have destroyed the trust network's legitimacy need is a new way to start harassing people on these forums. Take note of the folks that are for this idea and stay far away from them."
- 42.** April 2, 2024: "Now the other morons who want to blame me for them shilling for a money laundering operation that got shut down are coming for me with mean posts."
- 43.** April 3, 2024: "Og derangement syndrome is in full swing these days."

- 44.** August 1, 2024: “I gave Vod a couple chances to apologize for his lies, but he seems to not realize that his actions are not acceptable behavior. This recent bit of drama is due to Vod interjecting himself into a thread where he stated a lie about me as his reasoning for looking the other way as scammers pollute the DT Network. Not only is that a lie as I have explained to him multiple times why I have left the feedback I have, but he continued stating other lies as can be seen throughout that thread, escalating his attacks to provably honest community organizations I support. More of Vod’s lies are detailed on this post: <https://bitcointalk.org/index.php?topic=5122617.msg50665442#msg50665442> but I would recommend reviewing the entire thread. I think after reviewing all available information, it should become clear that Vod is a dangerous addition to the trust network, who has no problem enabling scammers out of fear, and abuses the responsibilities given to him by this forum. Besides Vod making a 360 from his humble days before he felt like god (that quote further below) to what he is doing now, it was pretty clear he was willing to go a step further than others when it came to his personal trust ratings. Clearly he asked for my trust in suggestive ways enough times to the point I was beginning to become frustrated. 2) Vod uses Merit questionably. Additionally, quotes like these show that Vod is motivated not by trying to have an accurate trust system, but by his fear of negative trust (see also the first quote in #1 he sent to all DT members). Due to this, I think him and those who have fallen victim to selling out their morals in order to be in the current DT1 network should be excluded, preferably by other users, as I think it is clear that the trust network is going down a dangerous path guided by fear over truth.”
- 45.** October 18, 2024: “Certain individuals want to do everything they can to damage my reputation out of jealousy. These people are a cancer.”
- 46.** April 22, 2025: “Now the community is just too toxic for something like this to work.”
- 47.** May 22, 2025: “What looks like 10 people all having a beef against one person is more often than not a single unhinged user with too much time on their hands.”
- 48.** Such further and other defamatory statements to be proven at trial.
- 49.** The Plaintiff believes that the Defendant has published or communicated his defamatory statements about the Plaintiff to other persons whom he cannot at present specify, but he will rely upon the publication or communication thereof to every person to whom he may discover the same to have been published or communicated to and will amend his Statement of Claim at that time to plead full particulars of the same.
- 50.** The Defendant’s defamatory statements were and are understood to be about the Plaintiff both in their natural and ordinary meaning and by innuendo.
- 51.** The Defendant’s defamatory statements as a whole convey the natural and ordinary inferential meaning as a matter of impression that: the Plaintiff is engaging in unethical, harassing, dishonest, deceptive, malicious, illegal and criminal conduct, including extortion; that he is a pedophile who sexually abuses minors, and in general that he is a mentally ill, retarded, crazy, unstable, harassing,

untrustworthy, corrupt and dishonest person who cannot be trusted and who is attempting to harm the network and its members.

- 52.** The Defendant's defamatory statements are untrue and intended to disparage and injure the reputation of the Plaintiff, as well as to injure him financially. The Defendant's defamatory statements are malicious, harassing, vexatious or otherwise made in bad faith and are deserving of punitive sanction.
- 53.** The Defendant's defamatory statements are available for viewing generally to the public so that any individual, group or entity with internet access may view them and they have been viewed and or republished by numerous individuals, groups and entities. The Plaintiff is not presently aware of all of said individuals who have viewed and/or republished the Defendant's defamatory statements but will plead particulars of the same once discovered.
- 54.** The Defendant has no lawful justification, excuse or other defence for making the defamatory statements about the Plaintiff.
- 55.** The Defendant's conduct as set out in the paragraphs above was flagrant and outrageous, which was calculated to harm the Plaintiff, and resulted in a visible and provable illness to the Plaintiff, thereby constituting intentional infliction of mental suffering upon the Plaintiff by the Defendant.
- 56.** The Plaintiff has suffered the following damages as a result of the Defendant's misconduct:
 - a.** Lost income, income earning opportunities, income earning capacity, time and productivity in the amount of \$5 million;
 - b.** Future loss of income in the presently estimated amount of \$5 million;
 - c.** Lost reputation in the amount of \$250,000.00;
 - d.** General damages for pain and suffering including psychological and physical harm in the amount of \$250,000.00;
 - e.** Loss of housekeeping in the amount of \$50,000.00;
 - f.** Out of pocket expenses for medical care and treatment in the amount of \$50,000.00;
 - g.** Future cost of care in the amount of \$50,000.00;
 - h.** Such further and other damages to be proven at trial.
- 57.** The full extent of the Plaintiff's damages remains unknown at the time of delivery of this Statement of Claim. However, such losses to the Plaintiff are continuing and ongoing.
- 58.** The Plaintiff will suffer irreparable harm if the Defendant is allowed to continue his misconduct in making defamatory statements.

- 59.** The Plaintiff pleads the *Defamation Act* R.S.A. 2000, c. D-7, as amended.
- 60.** The Plaintiff pleads to have been a person under a disability within the meaning of the *Limitations Act*, in that he was unable to take actions or make reasonable judgments in respect of matters relating to the within claim until sometime within the period of the 2 years immediately prior to the date the Statement of Claim was filed.
- 61.** The Plaintiff proposes the trial of this action be held at the Law Courts, in the City of Edmonton, Alberta and does not presently anticipate the trial will exceed 25 days in length.

Remedies sought:

- 62.** A Declaration that the Defendant has defamed the Plaintiff.
- 63.** Damages in the presently estimated amount of \$10,650,000.00, or such further and other amount as may be proven at trial, resulting from the Defendant's defamatory statements and intentional infliction of mental suffering, including for the losses set out in paragraph 56 above.
- 64.** Punitive, aggravated and exemplary damages in the amount of \$500,000.00, or such further and other amount as may be proven at trial, resulting from the Defendant's misconduct and callous disregard for the truth.
- 65.** An interim, interlocutory and permanent injunction prohibiting the Defendant from making any further defamatory statements about the Plaintiff, directly or indirectly, and prohibiting the Defendant from inciting and encouraging others to do so.
- 66.** Interest pursuant to the *Judgment Interest Act*, R.S.A. 2000, c.J-1 as amended, including prejudgment interest.
- 67.** Costs on a solicitor/client full indemnity basis or, alternatively, on such other basis as this Honorable Court may allow.
- 68.** Such further and other relief as this Honorable Court deems to be just and proper.

NOTICE TO THE DEFENDANTS

You only have a short time to do something to defend yourself against this claim:

20 days if you are served in Alberta

1 month if you are served outside Alberta but in Canada

2 months if you are served outside Canada.

You can respond by filing a statement of defence or a demand for notice in the office of the clerk of the Court of Queen's Bench at Edmonton, Alberta, AND serving your statement of defence or a demand for notice on the plaintiff's(s') address for service.

WARNING

If you do not file and serve a statement of defence or a demand for notice within your time period, you risk losing the law suit automatically. If you do not file, or do not serve, or are late in doing either of these things, a court may give a judgment to the plaintiff(s) against you.