

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

VIRGINIA RIDLEY and MAUREEN CASSIDY

Applicants

and

CANADIAN INTERNET REGISTRATION AUTHORITY, GODADDY INC.,
GODADDY.COM, LLC, A MEDIUM CORPORATION, WIX.COM, INC.,
and FACEBOOK, CANADA LTD.

Respondents

AFFIDAVIT OF VIRGINIA RIDLEY

I, Virginia Ridley, of the City of London, in the County of Middlesex, MAKE OATH AND SAY:

1. I have knowledge of the matters hereinafter deposed to, save and except where the same are stated to be based upon information or belief and where so stated I verily believe the same to be true.
2. I am currently a resident of London, Ontario and the former City of London municipal councillor for Ward 10. I ran for re-election in 2018.
3. On or around October 2, 2018, during the municipal election campaign, I became aware that a website had been created using the domain name www.virginiaridley.ca (the "Website"). I did not create the Website and did not instruct anyone to create the Website.

4. The Website is hosted by GoDaddy Inc., using a website design service call Wix.com and registered with the Canadian Internet Registration Authority (“CIRA”). Screenshots from this website are attached as **Exhibit “A”**.
5. In addition to the website, a Facebook page was also created that linked to the Website and contained the same information as the Website. I did not create the Facebook page and did not instruct anyone to create the Facebook page. Attached as **Exhibit “B”** are screenshots from that Facebook page.
6. The Website and Facebook site were devastating for me to review. Both contained inflammatory, derogatory and blatantly misconstrued information, accusing me of wasteful spending, being anti-free speech, and being “a colossal spendthrift, greedy, irresponsible and simply unacceptable candidate for Ward 10”. The Website’s use of my full name was extremely harmful. It was clearly intended to target those looking for more information about me or my campaign and who weren’t sure of my official website. The person who created the Website could have used a domain such as “donotvotevirginiaridley.ca” to make their intent clear, but they instead chose to try to capture an audience who genuinely wanted more information about me.
7. However, the most upsetting aspect of the Website was a page that accused me of child abuse. This allegation was based solely on the fact that I once brought my child to a budget meeting. This allegation was distressing and defamatory. The relevant portion of the Website is attached as page 3 of Exhibit A.

8. I immediately wanted to determine who created the Website to demand the removal of the Website and to ensure that they would cease and desist from further defamatory actions.
9. That day, I spoke with Maureen Cassidy, councillor for Ward 5, who had also been the target of a fake website and Facebook page a few weeks earlier. She told me that a friend of hers had noticed similarities between the language in the fake website and language used in several online petitions and blog by a man named Amir Farahi. I believe Mr. Farahi works for, or is a principal of, a consulting firm, Blackridge Strategy, that assisted numerous other candidates with their campaigns during the election. Attached as **Exhibit "C"** is a London Free Press article from October 6, 2018, discussing the candidates that were using Blackridge Strategy for their campaigns.
10. The evening of October 2, 2018, I was able to determine that GoDaddy was the host of the Website and that the page had been built using a website service called wix.com. I wanted to try to get the website taken down. There was a button on wix.com for account holders who have lost their username, login or password. This took me to a page that asked me to enter the domain name. I entered virginiaridley.ca and I was then asked for a cell phone. I entered my cell phone number and received a message saying that was not the correct information. I then entered Mr. Farahi's cell phone number. I received a confirmation that a message had been sent to the phone number to reset the username and/or

password. I did this around midnight. The website was taken down by the next morning.

11. On or around October 2, 2018, I also contacted CIRA. On October 11, 2018, they advised me that unless it was identity theft, they would not be able to identify the name of the registered domain holder. Attached as **Exhibit “D”** is the email I sent to CIRA and the response I received from CIRA. I also called them several times, and they suggested I contact GoDaddy directly to determine the identity of the account holder.
12. On or around October 11, 2018, I called a 1-866 number that I found from GoDaddy’s main website. I spoke with a customer service representative named Jared. He verbally confirmed to me over the phone that the registered owner of the Website was a man named Amir Farahi, and that he owned a number of other sites as well. Even though I received this verbal confirmation, I do not have any written proof that the website is owned by Amir Farahi and do not wish to commence an action against the wrong person.
13. I sent, through my legal counsel, a letter to Mr. Farahi, demanding that he apologize for the Website. This letter is attached as **Exhibit “E”**. I also hoped to ascertain whether he would take responsibility for the Website, or deny that it was him. He did not respond to my lawyer’s letters.
14. On October 25, 2018, Amir Farahi was interviewed by CTV News. On that program, he said that he was being framed and that someone had, in fact, stolen

his identity to set up the Website and another website involving City Councillor Maureen Cassidy. He stated that he was not responsible and he was hoping to find out who had created these websites. I do not know what steps he has taken to do so.

15. As a result of Mr. Farahi's denial of responsibility and allegation of identity theft, I am seeking to have Facebook, GoDaddy and CIRA confirm the registered owner of the Website and Facebook page. These organizations are the only parties that have the name, and possibly more importantly, the credit card or payment information of the person who registered the Website. Information respecting any other websites that the person owns will help determine whether there was identity theft.
16. I wish to be able to (a) investigate this matter further, (b) determine the identity of the Website owner, (c) seek relief from the Court and the police, as appropriate; (d) take any steps which are necessary to address the defamation that has occurred, and (e) prevent any further such defamatory comments. The only way to do so is if the Respondents in this action provide me with the information requested in this Application.
17. Without the requested information, I am unable to ascertain who created the harmful and defamatory Website and Facebook page and I will be unable to bring an action against those responsible. Such a result would allow people to make anonymous defamatory comments against me, with no accountability for

their actions. I am willing to reimburse the Respondents for reasonable costs associated with producing these documents.

18. I swear this Affidavit in support of an Application and for no other improper purpose.

SWORN BEFORE ME at the)
City of London, Ontario in)
the County of Middlesex)
this 1st day of March, 2019)

Virginia Ridley

A Commissioner, etc.

Home

Raising Her Salary

Raising Taxes

Wasteful Spending

Ranked Ballots

Pro-BRT

Pro Sanctuary City

Anti-Free Speech

Child Abuse

WHY VOTING FOR VIRGINIA RIDLEY IS A MISTAKE

Virginia Ridley has failed as a councillor during her tenure. She has proven to be a colossal spendthrift, greedy,



VIRGINIA RIDLEY IS A MISTAKE

Virginia Ridley has failed as a councillor during her tenure. She has proven to be a colossal spendthrift, greedy, irresponsible and simply unacceptable candidate for Ward 10.

Her actions speak for themselves



RIDLEY PAY INCREASE



In August 2017. Virginia

In August 2017, Virginia
Ridley gave herself a
30% pay increase.

In August 2017 Virginia Ridley voted in favour of a 30% pay increase for councillors, a raise from \$36,000 to \$48,000. The raise was meant to align the compensation of City councillors with the estimated median full-time employment income of average Londoners.

The problem? Being a City councillor is a part-time job.

Full-time compensation for part-time work, aside from being unfair, causes unnecessary confusion in regards to the expectations of being a councillor.

Source: <https://globalnews.ca/news/3687042/city-committee-approves-proposed-hefty-pay-increase-for-london-council-members/>

Who led the charge? Why Ridley herself.

Source: <https://www.cbc.ca/news/canada/windsor/london-city-councillor-says-it-s-time->

In 2016, Virginia Ridley, despite having worked for CAS, thought it appropriate to bring her son to an elongated London City budget meeting. Not only is it true that when dealing with taxpayer dollars, any distraction that could impact decisions on the application of taxpayer dollars is unacceptable, but it is moreover irresponsible to expect a child to sit through a meeting that adjourned at 2am. Ridley was given due notice of the Saturday budget meeting, hence alternate arrangements should have been made — no excuses. City of London is a business not a boutique nursery.

Source: 2016 Budget Meetings

VIRGINIA RIDLEY

**AGAINST
FREE
SPEECH**



If only Ridley was simply profligate—she is also apparently anti-free speech. Recently the councillor supported a motion that read:

“Civic Administration be directed to prepare the necessary formal council policy to confirm the prohibition of activities of organizations whose ideologies is contrary to the City of London are not permitted in civic spaces, and/or facilities and spaces.”

This motion appears to violate the Code of Conduct for Members of Council under Rule 2.5 which states:

“Members shall seek to serve the public interest by upholding both the letter and the spirit of the laws of the Federal Parliament, the Ontario Legislature, and the by-laws and policies of the Corporation.”

Andrew Sancton, the former head of Western University’s local government program and a highly respected Canadian academic has said that the linguistic ambivalence of this motion of council could have serious consequences. “This is extremely dangerous because it looks like it’s almost limitless in its application, and it could cause all kinds of trouble,” Sancton said.

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Constitutional expert and Professor at the University of Waterloo, Emmett Macfarlane, has come out opposing the anti-free speech motion as well. He says any bylaw using language similar to the council motion wouldn’t withstand a constitutional challenge. “(It) would, in my view, fall clearly offside with the Charter of Rights and freedom of expression guarantees,” he said. “It’s not to say that there are no limits whatsoever that can be placed on expression, but if you have such broad and vague and ambiguous language, you’re going to run into serious trouble, I think.”

On January 30, Ridley voted in favour of London becoming a sanctuary city. What would that imply for its citizens? A sanctuary city is a safe haven for illegal immigrants—those not granted permission to stay in Canada—and gives them access to municipal services. It also means that the city's local police will not participate in enforcing federal immigration laws.

Source: <https://pub-london.escribemeetings.com/meeting.aspx?id=458b13a9-9001-4813-9659-2dea441662e1&Agenda=Post/Minutes&lang=English>

VIRGINIA RIDLEY

- Wants to spend \$500 million to save only 4 minutes of travel
- Wants to raise your taxes to do it
- She agrees with the City's Director of Roads who said, "**we cannot have residents primarily using their cars.**" March 9, 2017



BRT BOOSTER!

Virginia Ridley wants to spend over half a billion dollars on BRT, which would make it the most expensive project in London's history. But would it be worth it?

First, what does the BRT plan involve? It involves the removal of automobile lanes on major arterial roads and replacing them with dedicated lanes for busses only. Second, who uses public transit? Only 9.2% of London (even less in Westmount) residents use public transit and of that 9.2%, 50% are post-secondary students (Western and Fanshawe). Third, what improvements would it bring? It is estimated that at best it will only save 4 minutes on a normal journey relative to the current public transit system.

So, why go ahead with it? In support of BRT, on March 9, 2017 the City of London's Director of Roads and Transportation said "we cannot have residents primarily using their cars." Well, the cost is equivalent to buying every public transit user their own vehicle. But that's really only the tip of the budgeting iceberg.

In Kitchener-Waterloo, for example, a recently completed rapid transit system has seen the property

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In Kitchener-Waterloo, for example, a recently completed rapid transit system has seen the property tax bill jumped 13% from 2011 to 2019. In turn, London City Hall has already stated that there will be property tax increases as a result of BRT. Ontario's Auditor General has further stated that it is expected for a project such as this to have cost overruns and that London taxpayers would be in that scenario the ones on the hook. In addition, BRT would create a traffic nightmare during your commute to work; it will cause over 10 to 15 years of construction on major roads and reliance on detours. Moreover, from 2015-2017 ridership has been 6% below forecast. Average fare paid has consequently also fallen far below plan projections. Such conditions are going to create a larger budgetary demand on taxpayers to fund BRT. Add to this demand the extra cost of conditions required by Western University that is yet to be determined.

All in all, the lifecycle operating costs of BRT alone would take up approximately 1/3 of the entire City's budget; BRT would eliminate on-street parking that is already at a premium; and like a bridge to nowhere, BRT would not connect with VIA rail, the airport, or the Greyhound bus terminal. The nail in the coffin? The busses themselves will be out of date before the project is completed even though it is set to serve London's transit needs for 30+ years.

But Virginia Ridley knows this well. Here is a screenshot from her website in 2014 during her

But Virginia Ridley knows this well. Here is a screenshot from her website in 2014 during her campaign.

What do you see as ways of improving public transit in London, what are the estimated costs of your ideas, and on what basis do you think your ideas will work if adopted?

Posted on October 3, 2014 by admin

Do you know that less than 9% of the people in Westmount according to today's release from Stats Canada use public transportation to get to work.

Why is this? I know, and you know. Our transit system is broken. Don't get me wrong, there have been many improvements over the years to incorporate technology – but the current transit system does not work for many people of Westmount. For me to get to work – and I double checked this only this morning so I could give you accurate information, I would have to leave my house at 6:35 in the morning. I would take one bus to Oxford and Richmond, then wait 15 minutes, transfer to another bus which would take me the rest of my destination. My total travel time in them mornings only would 1 hours and 25 minutes. Then, after completing work at 4:30, I would get on the bus (if there is space as my closest stop would be Fanshawe College), and arrive home around 6 pm.

There are a few issues there – Spending almost 3 hours a day on transit is not viable for many people.

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There are a few issues there – Spending almost 3 hours a day on transit is not viable for many people.

In 2014, according to this screenshot, Ridley acknowledges that people in Westmount who take transit endure 3 hour roundtrip commutes and that she wanted to fix this problem during her term in office (2014-18). Now she's running for re-election and still has not fixed the problem. Her solution today is to spend half a billion dollars on BRT which won't service Westmount—where people will still be enduring 3 hours of transit per day. More wasteful spending.

On October 22 London will make history as the first Canadian city to use a ranked ballot to elect both councillors and its mayor. The switch, backed by Virginia Ridley, to ranked ballots from first-past-the-post is estimated to cost the City over \$600,000 (some experts say it will be closer to a million dollars).

But why? Supposedly ranked ballots are fairer, reduce strategic voting, and would increase voter turnout. According however to former councillor Sandy Levin, who enacted a scholarly comparison of the two systems, it remains inconclusive whether RCV increases voter turnout, reduce strategic voting or ensure that the winner always receives at least 50% plus 1.

Source: <https://pub-london.escribemeetings.com/filestream.ashx?DocumentId=31078>

Moreover, unlike in Kingston and Cambridge for example, London City councillors decided to make the switch without a referendum; without consulting the constituents of London. Why? Because ranked ballots favour incumbents like Ridley, who can continue to access expense accounts.

Maybe raising property taxes and filling the coffers of the City is indeed a good idea, but is Virginia Ridley an appropriate steward of those coffers? Evidently not...

For a start, in October 2016 Ridley commissioned an international real estate advisory and development firm called Live Work Learn Play to assess London's core and come up with recommendations to attract unique businesses. The cost? \$540,000. The outcome? Not a single business opened up in the core on the heels of the prohibitive contract awarded to Live Work Learn Play by Ridley.

Indeed all the report accomplished was to denigrate London's vulnerable communities as 'a blight' on the core and criminally undervalue the work of local anti-poverty organizations and health workers trying to reduce the stigma around the homeless and their suffering.

Source: <https://lfpres.com/2016/10/28/downtown-london-advocates-hammer-540000-consultants-report-that-calls-street-culture-a-blight/wcm/9021eaab-2c57-cc6f-dc88-b672b25cf27b>

In addition, Virginia Ridley is the highest spending City councillor. From 2015 to 2018 Ridley expensed \$44,197 worth of purchases or nearly \$30,000 more than the councillors in wards 5, 6, 14 and \$25,000 more than those in wards 4, 11, 8, 7 and 13. In 2015 alone she spent over \$3,000 on her car-likely prompting the City to implement a monthly vehicle allowance. Her outlandish expenses include a home sofa, nearly \$2,000 for home-office internet, a laptop tote bag for \$75, a litany of \$40 lunches and enough Otterbox iPhone cases to open up her own pop-up stand.

Source: <https://www.london.ca/city-hall/city-council/Pages/default.aspx>

When asked about the spending of other councillors, Ward 11 councillor Stephen Turner (a paramedic) wisely said 'I Don't get paid to drive to my day job...Why would I claim any automobile expenses other than the extraordinary? Just because I have a \$15,000 limit doesn't mean I have to spend it.'

Source: <https://lfpres.com/2016/02/07/london-city-council-expenses-for-2015-released/wcm/f9f4e8fc-7690-8972-0195-f7dbbd5f4bd8>

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Throughout Virginia Ridley's tenure as a City councillor property taxes have been **raised by 11.2%**, including the most recent tax hike of 2.8% approved in December 2017. Can Londoners afford to continue stumping up more hard earned dollars to the City? Where is all of that money going? To see where Virginia spent your money see the "Wasteful Spending" section.

Source: <https://www.cbc.ca/news/canada/london/london-city-council-approved-2018-budget-1.4446503>

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In August 2017, Virginia

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Full-time compensation for part-time work, aside from being unfair, causes unnecessary confusion in regards to the expectations of being a councillor.

Source: <https://globalnews.ca/news/3687042/city-committee-approves-proposed-hefty-pay-increase-for-london-council-members/>

Who led the charge? Why Ridley herself.

Source: <https://www.cbc.ca/news/canada/windsor/london-city-councillor-says-it-s-time-for-a-pay-raise-1.3291115>



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<https://www.virginiaridley.ca/pro-brt>

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Like Follow Share ...

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BRT BOOSTER!

Many anti-BRT candidates using same London PR firm

One candidate in at least half of London's 14 electoral wards is campaigning with behind-the-scenes help from the same local public affairs firm, most on a platform against the city's contentious bus rapid transit plan.

MEGAN STACEY ([HTTPS://LFPRESS.COM/AUTHOR/MSTACEYPOSTMEDIA](https://lfpres.com/author/mstaceypostmedia)) Updated: October 6, 2018

GALLERY:

CANDIDATES USING SAME LONDON PR FIRM

(<https://lfpres.com/gallery/candidates-using-blackridge>)

(#)

1/3

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One candidate in at least half of London's 14 electoral wards is campaigning with behind-the-scenes help from the same local public affairs firm, most on a platform against the city's contentious bus rapid transit plan.

Three of the ward candidates working with Blackridge Strategy Inc., a London company formed earlier this year, are using the same social media posts to question the \$500-million BRT plan – including similar versions of an image that matches the header of a newly-created anti-BRT website, stopbrt.com (<http://stopbrt.com/>).

Of the seven, the lone ward candidate who has not come out against the transit plan, Ward 7 incumbent Josh Morgan, has declared a conflict on almost all BRT-related votes because he works for Western University. He rejected the idea of any connections between candidates.

"I have an independent contract with them for the services I'm contracting them for," he said of Blackridge. "I, and my campaign, have control."

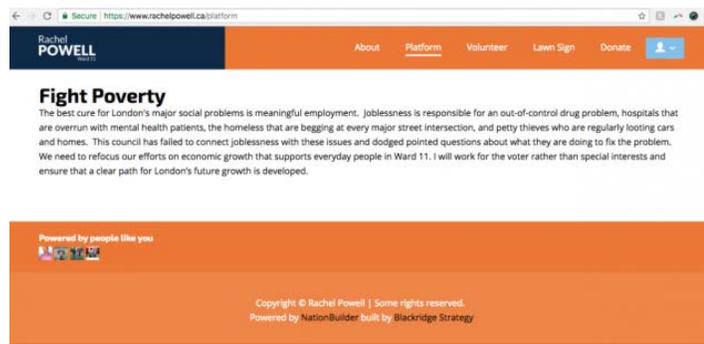
The kind of political consulting Blackridge, which also is managing a website for mayoral candidate Ed Holder, offers its clients is common in elections at all levels.

But seeing the work of one company in so many campaigns is unusual in London and suggests at least ties between groups with shared opposition to the city's largest-ever infrastructure project, one expert said.

(<https://postmedialfpress.files.wordpress.com/2018/10/powellwebsite-e1538785644802.png>).

"There obviously seems to be some kind of behind-the-scenes links going on, and people of a particular bent are aware of them and are taking advantage of them," Joseph Lyons, the head of Western University's local government program, said of Blackridge.

He suggested it could be a way to advertise and mobilize against BRT.



(<https://postmedialfpress.files.wordpress.com/2018/10/powellwebsite-e1538785644802.png>).

“You think of the logic behind a third-party advertiser: You have a clear position on an issue that you want to get out there, to get publicized, but you can’t have direct connections with campaigns. It’s kind of a back-door way of doing that, creating a political consultancy firm that can co-ordinate between candidates as a function of the service that they provide.”

There’s little information available about Blackridge online, and the company’s website contains no details about its services or staff.

Six candidates and another source say one or the other or both of Amir Farahi, a one-time council candidate, and school board trustee Jake Skinner, who’s running for re-election, are at the helm of their municipal campaign work through Blackridge.

Neither answered repeated Free Press requests for comment this week.

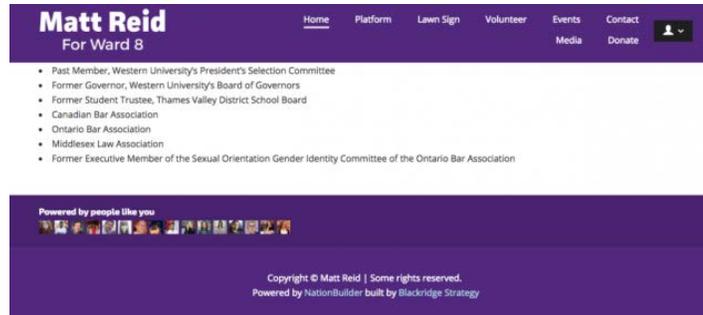
Skinner, a Thames Valley District school board trustee, had been gunning for the Progressive Conservative nomination in London West ahead of the June provincial election, before Doug Ford took over as party leader and appointed former broadcaster Andrew Lawton to run instead.

Mayoral candidate Holder meets with Blackridge staff regularly to manage his website and related e-mail blasts, but not for political advice, his campaign team says.

“We’re not connected with the other candidates. We have a confidentiality agreement in place with Blackridge,” said Michael Meagher, handling communications for Holder’s campaign.

Incumbents Phil Squire and Morgan said they’re using the firm for help with their websites, graphic design, photos and some political guidance.

(<https://postmediapress.files.wordpress.com/2018/10/reidwebsite-e1538785516311.png>)



(<https://postmediapress.files.wordpress.com/2018/10/reidwebsite-e1538785516311.png>)

Of the three candidates who use anti-BRT Facebook posts styled and themed similarly to each other and one used on stopbrt.com (<http://stopbrt.com/>), Randy Warden in Ward 5 and Steve Hillier in Ward 14 confirmed they're working with Blackridge.

The website of Ward 11 candidate Rachel Powell – which matches those of most other municipal Blackridge clients – had shown it was “built by Blackridge Strategy” before the tag was removed recently, but she did not directly confirm her relationship with the company.

London lawyer Michael Lerner, spokesperson for stopbrt.com (<http://stopbrt.com/>), did not respond to a request for comment about the connection between the images. [Stopbrt.com](http://stopbrt.com/) (<http://stopbrt.com/>) is a new anti-BRT group that's distributing lawn signs protesting the \$500-million project.

All the candidates who responded to The Free Press stressed Blackridge isn't running their campaigns, but is supplying materials and offering “advice.”

“Although I have run once before, I still see myself as a novice,” Warden said.

Squire described Blackridge's services as “one-stop shopping,” convenient for a busy campaign.

“I wouldn't know how to make up a website if it jumped down my throat,” he said.

mstacey@postmedia.com (<mailto:mstacey@postmedia.com>)

twitter.com/MeganatLFPpress (<https://twitter.com/MeganatLFPpress>)

WHAT BLACKRIDGE DOES

Website development: Blackridge uses Nation Builder, a common digital platform, to build websites and co-ordinate mailings to subscribers, among other features.

Political strategy: Media and SWOT (strengths, weaknesses, opportunities, threats) analyses, political advice and insight.

Graphic design: Social media posts, ads, flyers, signs.

Multimedia: Photos, videos.

CAMPAIGNS INVOLVED WITH BLACKRIDGE

Mayoral candidate Ed Holder's website is managed by Blackridge. That website management includes regular meetings with Blackridge.

Ward 5 candidate Randy Warden uses Blackridge for campaign materials such as signs and flyers, social media posts and a website, and gets political advice from Skinner. He's running anti-BRT social media posts that have the same design as those used by Powell and Hillier.

Ward 6 candidate Phil Squire uses Blackridge for campaign materials such as signs and flyers, his website, and he works with Skinner.

Ward 7 candidate Josh Morgan contracted Blackridge to do his website, photos, graphic design, a media analysis and SWOT (strengths, weaknesses, opportunities, threats) review of his campaign.

Ward 8 candidate Matt Reid's website had shown it was "built by Blackridge Strategy" before the tag was removed recently.

Ward 10 candidate Paul Van Meerbergen is relying on digital and technical support from Blackridge, including help with his website and online presence.

Ward 11 candidate Rachel Powell has a campaign website that had shown it was "built by Blackridge," and uses anti-BRT social media posts that have the same design as those used by Warden and Hillier.

Ward 14 candidate Steve Hillier tapped Blackridge for political advice, signs, and his website. He uses anti-BRT social media posts that have the same design as those used by Warden and Powell.

RELATED

Mayor's race: The candidates in their own words (<https://lfpres.com/news/local-news/mayors-race-the-candidates-in-their-own-words>)

Ward 1: The candidates in their own words (<https://lfpres.com/news/local-news/ward-1-the-candidates-in-their-own-words>)

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Ward 3: The candidates in their own words (<https://lfpres.com/news/local-news/ward-3-the-candidates-in-their-own-words>)

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Ward 5: The candidates in their own words (<https://lfpres.com/news/local-news/ward-5-the-candidates-in-their-own-words>)

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Ward 7: The candidates in their own words (<https://lfpres.com/news/local-news/ward-7-the-candidates-in-their-own-words>)

Ward 8: The candidates in their own words (<https://lfpres.com/news/local-news/ward-8-the-candidates-in-their-own-words>)

Ward 9: The candidates in their own words (<https://lfpres.com/news/local-news/ward-9-the-candidates-in-their-own-words>)

Ward 10: The candidates in their own words (<https://lfpres.com/news/local-news/ward-10-the-candidates-in-their-own-words>)

Ward 11: The candidates in their own words (<https://lfpres.com/news/local-news/ward-11-the-candidates-in-their-own-words>)

Ward 12: The candidates in their own words (<https://lfpres.com/news/local-news/ward-12-the-candidates-in-their-own-words>)

From: CIRA Disclosure Requests <disclosurerequests@cira.ca>
Date: October 11, 2018 10:29:09 AM
To: "v.ridley@me.com" <v.ridley@me.com>
Subject: Request for Disclosure of Registrant Information: virginiaridley.ca

Hi Virginia,

Re: Request for Disclosure of Registrant Information

This notice is provided in response to your Request for Disclosure of Registrant Information (the "Request"). All capitalized terms used in this notice, but not defined, shall have the meanings assigned to such terms in CIRA's *Request for Disclosure of Registrant Information - Rules and Procedures* (the "Rules and Procedures").

CIRA has now reviewed your request, and based on the information provided therein, CIRA has denied your request, as it does not comply with CIRA's Rules and Procedures.

The policy applies only to a Dispute relating to a Registered Canadian Trade-mark, Registered Canadian Copyright, Registered Federal or Provincial corporate, business or trade name, Issued patent or Identity theft.

CIRA has an Interested Party contact form, where you can reach out to the owner of the domain name. Please find this form here: <https://services.cira.ca/agree/mdf/index.action>. If you fill in the domain name, it will prompt you to write a message.

CIRA is unable to disclose the Registrant Information under these circumstance, however you can also contact the Registrar of the domain name. The domain name was registered at the Registrar Go Daddy Domains Canada, Inc (**support@godaddy.com** or **66-938-1119**). You can contact them to see what their policy is on this topic.

Please do not hesitate to contact CIRA at disclosurerequests@cira.ca or 1-877-860-1411 if you have any questions.

Sincerely,

Disclosure Requests

Canadian Internet Registration Authority

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This message has been scanned by [LastSpam](#) eMail security service, provided by [TUC Managed IT Solutions](#).

From: CIRA Product Support <info@cira.ca>
Date: October 03, 2018 11:29:17 AM
To: "v.ridley@me.com" <v.ridley@me.com>
Subject: RE: abusive website [ref: _00DC016kps._500C01KLHTm:ref]

Thank you for reaching out to CIRA.

Unfortunately we do not govern what is shown on websites, we only govern the registration of the .CA domain names.

You can always report this website and it's content to the CCIRC as they can further escalate the matter and judge based on content.

Here is the link to their website:

<https://cyber.gc.ca/en/>

Have a nice day.

----- Original Message -----

From: Virginia Ridley [v.ridley@me.com]

Sent: 10/2/2018 10:36 PM

To: info@cira.ca

Subject: abusive website

Hello, I own virginiaridley.com. Someone recently bought virginiaridley.ca and has been posting things to target me - most specifically misinformation, but most harmful that I have abused my child. I would like this website to be removed, and I would like to know who registered the site (or report to to csaunders@london.ca - the city clerk in charge of elections) as they are in violation of the elections act as they are not a registered third party.

I thank you for your consideration in looking into this.

Kind Regards,

Virginia Ridley

<http://www.virginiaridley.com>

ref:_00DC016kps._500C01KLHTm:ref

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**Polishuk
Camman & Steele**
Barristers and Solicitors

Alexander P. Polishuk (retired)

Andrew F. Camman

Anthony F. Steele

Susan A. Toth

Aislyn Griffin

Anna Berger

October 16, 2018

Amir Farahi
204-186 King St.
London, ON

via email to: connect@amirfarahi.ca

Dear Mr. Farahi:

Re: virginiaridley.ca Website and Facebook Site

On or around October 2, 2018, a website was published and a Facebook site created containing defamatory information meant to lower Ms. Ridley's reputation in the community in the middle of an election. Presumably, the purpose was to reduce her chances of being elected.

The host provider of virginiaridley.ca, GoDaddy, confirmed that the registered owner of that domain was you. The domain is also connected to your personal cell phone number.

In purposefully using the domain address www.virginiaridley.ca, you ensured that potential voters could accidentally stumble upon your fake site when they were seeking my client's actual website for re-election information.

That website and corresponding Facebook page contained numerous defamatory comments, including, and most egregiously, a blatantly false accusation of child abuse. The website also contains other defamatory comments, including accusing Ms. Ridley of being against free speech, describing her as profligate, and suggesting she had violated the City of London's Code of Conduct.

Mr. Farahi, not only is such a website unbecoming a professional in London that is a member of a political consulting firm providing assistance to various municipal candidates, it is a wanton act of bad faith, harassment and defamation.

We note that the website has now been taken down. Should it be re-published, Ms. Ridley will have no choice but to immediately bring an action against you. Please accept this as a formal cease and desist of any further publications that contain any derogatory comments about Ms. Ridley and to cease and desist from re-publishing either the website or Facebook site.

Despite the above, Ms. Ridley does not wish to pursue unnecessary, costly and public litigation. In order to fully and finally resolve this matter, however, Ms. Ridley does require a public apology within 7 days of receipt of this letter. The manner and content of which shall be agreed to by Ms. Ridley. This apology shall include an unequivocal admission that the child abuse allegation was false and had no basis in fact, and an admission that the website as a whole was inappropriate and an inexcusable lapse in judgment. It will also include an apology to Ms. Ridley and her family for any harm or hardship the website caused.

Ms. Ridley is not unsympathetic to the highly public nature of your actions and the media interest in this story, however. She has indicated that she will consider allowing you to post an accepted apology publically, but anonymously, on the virginiaridley.ca website and in written form for her to post on her social media. In addition, you will provide her with a personal note of apology in your name which will not be publicized unless you republish the website or denigrate her character in the future. Finally, should you choose this option, Ms. Ridley will require a donation to the charity of her choice in the amount of \$5,000.00 as further reparation.

Regardless of the option you choose, Ms. Ridley will require you to transfer the ownership of the virginiaridley.ca domain to her.

We look forward to your timely response. If we do not hear from you, I will advise my client to bring an action against you and any others who are responsible.

Yours very truly,

POLISHUK, CAMMAN & STEELE



Susan Toth