



This is the 1<sup>st</sup> Affidavit  
of Benjamin Morley in this case  
and was made on May 16, 2025

No. S248901  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

MICHAEL LARES

PETITIONER

AND:

PETER VAN DER HEYDEN and FLYING "L" RANCH  
LTD.

RESPONDENTS

**AFFIDAVIT**

I, Benjamin Morley, lawyer, C/O McQuarrie Hunter, Suite 100, 13450 102nd Avenue, Surrey, British Columbia, AFFIRM THAT:

1. I am a lawyer for the petitioner, Michael Lares, and as such have personal knowledge of the facts hereinafter deposed to except where stated to be on information and belief, in which case I verily believe them to be true.
2. I make this affidavit in response to the application by the respondent, Peter van der Heyden, to disqualify McQuarrie Hunter ("McQuarrie") from acting as Mr. Lares' counsel. By affirming this affidavit, I am not waiving any solicitor-client privilege on behalf of Mr. Lares other than related to the "Defamation Matter", as further defined below.

**The Defamation Matter**

2. On or around January 15, 2024, McQuarrie was retained by Mr. Lares and the respondent, Flying "L" Ranch Ltd. (the "Company") to respond to defamatory social media postings made by third parties against Mr. Lares and the Company (the "Defamation

Matter”). Attached as **Exhibit “A”** to this affidavit is a true copy of McQuarrie’s retainer letter executed by Mr. Lares personally and on behalf of the Company. I did most of the “leg work” for the Defamation Matter under the supervision of the senior counsel on this matter, Royal Morton.

3. McQuarrie’s engagement was limited to review of extensive third party defamatory publications and issuing letters to those parties and social media companies. By way of example:

- (a) attached as **Exhibit “B”** to this affidavit is a copy of screenshots of postings by “thedevyndestinee” on Instagram and a copy of the letter which McQuarrie sent to Devyn McMillan on February 16, 2024;
- (b) attached as **Exhibit “C”** to this affidavit is a copy of screenshots of postings by “oh\_alisse” on Instagram, a screenshot of her Instagram account page and a copy of the letter which McQuarrie or Mr. Lares sent to Alisse Andrews on or about February 20, 2024;
- (c) attached as **Exhibit “D”** to this affidavit is a copy of screenshots of postings by “offgridlifeuncensored”; and
- (d) attached as **Exhibit “E”** to this affidavit is a copy of the letter from McQuarrie, addressed “To Whom It May Concern” dated February 27, 2024.

4. At all times, McQuarrie took instructions from Mr. Lares for the Defamation Matter, which was done by telephone calls with Mr. Lares in which I took notes, or through email correspondence between Mr. Lares and me or between Mr. Lares and Barbara Poth or Melissa Blackwell, our legal assistants.

5. Attached as **Exhibit “F”** to this affidavit is a true copy of all my notes for the Defamation Matter, which are from various telephone calls, from meetings or from my review of social media postings.

6. At no point was McQuarrie engaged or acted for the Company with regards to any negotiations of the sale of Mr. van der Heyden’s shares to Mr. Lares, or the transfer of the

80 Acres Lands back from Mr. Lares, in the course of the Defamation Matter. However, some of our time for our new shareholder's dispute file, in which we represent Mr. Lares alone, was included on the final invoice for the Defamation Matter dated April 16, 2024. From my review of that final invoice, virtually all of the work referenced was not related to the Defamation Matter, and should not have been billed to that file.

7. When it became apparent that Mr. Lares' buy-out of Mr. van der Heyden's shares was not going to be completed, McQuarrie opened a new file for Mr. Lares alone on or around April 18, 2024. McQuarrie has acted for Mr. Lares alone concerning his shareholder dispute with Mr. van der Heyden, as well as in responding to further defamatory online content.

**Response to Mr. van der Heyden's Request for Information**

8. From my review of the file, at no point in the course of the Defamation Matter did McQuarrie receive information belonging to the Company that we treated as confidential as between Mr. Lares, Mr. van der Heyden, and the Company, or which we could use against the Company or Mr. van der Heyden.

9. Based on my review of all the correspondence in the Defamation Matter and our subsequent shareholder dispute file with Mr. Lares alone, Mr. Morton and I had communications with Mr. van der Heyden's first lawyer, Mr. Yvan Guy Larocque, between approximately May 2024 and January 2025. During this time, Mr. Larocque never raised a concern that we had received confidential information from the Company as a result of the Defamation Matter.


10. On or around January 29, 2025, we provided Mr. van der Heyden's second lawyer, Drummond Lambert, with additional materials related to McQuarrie's engagement for the Defamation Matter. Redacted items were provided due to Mr. Lares' concern that Mr. van der Hayden would misuse these materials.

11. Attached as **Exhibit "G"** to this affidavit is a true copy of the letter from Eyford Partners to McQuarrie dated February 19, 2025.

12. At no point did Mr. van der Heyden notify us directly or through his lawyers that he wished to have the Company appoint its own independent counsel.

13. We currently represent Mr. Lares in his individual capacity in this action and two other actions:

- (a) *Lares v. McMillan et al.*, New Westminster Registry #257137, which is a defamation action brought by Mr. Lares against various third parties alleging that they have made various defamatory posts and statements about him from late 2023 to early 2025. The Company is not a party to this action; and
- (b) *Van der Heiden v. Lares*, Vancouver Registry #243219, which is an action brought by Mr. van der Heyden against Mr. Lares alleging a breach of fiduciary duty and a misappropriation of company funds. The Company is not a party to this action.

AFFIRMED BEFORE ME at Surrey, )  
 British Columbia, on May 16, 2025. )  
 )  
 )  
 )  
 A Commissioner for taking Affidavits for )  
 British Columbia )

  
 \_\_\_\_\_  
 BENJAMIN MORLEY

**ROBERT W. GODDARD**  
 Barrister & Solicitor  
 McQUARRIE HUNTER LLP  
 Suite 1500, 13450 - 102 Avenue  
 Surrey, BC V3T 5X3  
 604.581.7001

This is Exhibit "A" referred to in the  
Affidavit #1 of Benjamin Morley  
sworn before me on this 16<sup>th</sup> day of  
May, 2025



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A Commissioner for taking Affidavits  
For the Province of British Columbia



McQuarrie Hunter LLP  
 Suite 1500, 13450 - 102 Ave  
 Surrey, BC V3T 5X3  
 Tel: 604.581.7001  
 Fax: 604.581.7110  
 WWW.MCQUARRIE.COM

Managing Lawyer: Royal J. Morton  
 E-Mail: [morton@mcquarrie.com](mailto:morton@mcquarrie.com)  
 Legal Administrative Assistant: Barbara Poth  
 E-Mail: [bpoth@mcquarrie.com](mailto:bpoth@mcquarrie.com)  
 Direct Line: 604-580-7061

Our File No.: TBD

January 15, 2024

VIA EMAIL: [michael@flyinglranh.ca](mailto:michael@flyinglranh.ca)

Flying "L" Ranch Ltd. and Michael Lares  
 c/o Michael Lares  
 8554 Nemiah Valley Road, PO Box 10  
 Nemiah Valley, BC V0L 1X0

Dear Sir:

**Re: Defamation Jonathan Skeels, Kristy McQuade, Devyn McMillan and Elise Reculard  
 Engagement Letter**

Thank you for retaining McQuarrie Hunter LLP to provide you with legal advice and services. We welcome you as a client and take this opportunity to enclose a copy of our Terms of Engagement [the "Terms"], which, together with this letter, will comprise our Engagement Agreement with you. If you have any questions or concerns regarding the Engagement Agreement we ask that you contact the writer as soon as possible.

**SCOPE OF LEGAL SERVICES & INSTRUCTIONS**

We confirm that you have retained us to act for you with respect to the above noted matter.

If we receive further instructions from you to change the scope of our engagement, we confirm that the terms of this Engagement Agreement will apply. We further confirm that only you will provide us with timely instructions and assistance in obtaining information or documents that we may require during the course of our engagement.

Further, we confirm you will accept delivery or service of any legal process or notices or correspondence from our office to you by email at: [michael@flyinglranh.ca](mailto:michael@flyinglranh.ca), unless otherwise agreed to in writing by us.

**FEES**

In setting our fees, we will give primary consideration to the time and effort devoted to the advice and services provided by our lawyers and personnel to your matter however we reserve the right to modify our fees to reflect the value of services provided in addition to the specific time expended. Please refer to the enclosed Terms for further information in this regard.

Our hourly rates for the lawyers and personnel who may provide services to you are:

- Royal J. Morton \$575.00
- Doug Connolly \$600.00
- Dan Moseley \$465.00
- Brad Kielmann \$455.00
- Parveen Karsan (tax law) - \$700.00
- Associate lawyers \$295.00 - \$380.00
- Articled students \$280.00
- LAA –Barbara Poth \$125.00

*me*

We may also engage other lawyers and personnel to assist us in providing you with legal advice and services in a timely and efficient manner. As indicated in the Terms, our fee rates are revised annually and any adjustments will be reflected in our accounts to you.

**RETAINER AND PAYMENT OF ACCOUNTS**

We require receipt of an initial retainer of \$12,000.00 payable to McQuarrie Hunter in trust. We will pay our interim accounts from your retainer, as authorized by this Engagement Agreement. You agree to promptly deposit further funds with us so that the retainer amount on deposit with us does not fall below the greater of the initial retainer of \$12,000.00 or any increased retainer amount called for under this agreement. A higher retainer may be required for certain work such as for examination for discovery or trial or contested pre-trial applications.

As indicated in the Terms, accounts that we issue are payable on the date that they are issued and full payment is required within 10 days if there are insufficient funds.

**CONFIRMATION OF TERMS**

Once you have reviewed and accepted the enclosed Terms of Engagement, kindly initial each page where indicated and sign the enclosed copy of this letter to confirm your acceptance of our Engagement Agreement and return both documents to our office.

We look forward to working with you in connection with this engagement and in connection with any other matters for which you may require our legal services.

Should you have any questions or concerns please contact the writer directly.

Yours truly,

**MCQUARRIE HUNTER LLP**

**ROYAL J. MORTON\***

Partner

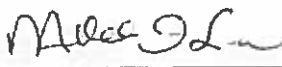
\*Royal Morton Law Corporation

RJM/mb


Enclosure

**TERMS AND CONDITIONS OF THIS ENGAGEMENT AGREEMENT ARE HEREBY AGREED TO:**

Date: JANUARY 18, 2024

  
Michael Lares

Date: JANUARY 18, 2024

  
Flying "L" Ranch Ltd., by its authorized signatory,  
Michael Lares, Director

## MCQUARRIE HUNTER LLP

### TERMS OF ENGAGEMENT

#### 1. INTRODUCTION

We are pleased that you have chosen to retain McQuarrie Hunter LLP to provide you with legal advice and services.

By way of our Engagement Letter and these Terms of Engagement we wish to set out in advance the conditions that will govern our professional relationship with you. Please review these terms carefully and contact us to discuss any questions or concerns prior to acceptance.

If you instruct us to perform further work following receipt of this letter, we will proceed on the basis that you have accepted the terms set out herein.

#### 2. SERVICE RELATIONSHIP

We will identify a primary contact lawyer who will assume general responsibility for ensuring that you receive satisfactory legal services in connection with all matters. You should feel free to discuss with that lawyer any and all aspects of the legal services that we provide to you, including the services provided by other lawyers or staff or any issues relating to our account.

All communications with clients will be conducted via email, unless you make a specific request for an alternate method of communication. If you do not wish to communicate via email, please advise us in writing.

#### 3. DOCUMENT MANAGEMENT

In order to simplify case management, we may incorporate Summation as our document management program to consolidate our legal documents and electronic data. You agree to allow us to use this program to manage your file.

#### 4. PROFESSIONAL FEES

In setting our fees, we give primary consideration to the time and effort devoted to the legal advice and services provided by our lawyers and other personnel, however fees calculated on this basis often do not reflect the full value of the services. Accordingly, we reserve the right to increase our fees to take into account the following value factors:

- The complexity, difficulty or novelty of the issues involved;
- The skill, specialized knowledge and responsibility required;
- The monetary value of the matter (including the amount at risk and the amount recovered);
- Time constraints/deadlines (including work after hours and on weekends);
- The experience, reputation, and expertise of our lawyers and personnel performing the services;
- The extent to which our office procedures, systems, and experience result in efficiencies;

- The customary charges of other lawyers of equal standing in similar matters and circumstances;
- The likelihood that the acceptance of the engagement will result in our inability to accept other employment; and
- Achieving a successful result.

The recording of time on any matter may be recorded in increments of one-tenth of an hour (0.1 = 6 minutes) to reflect the time and value of services rendered, including but not limited to the following: case assessment, development, and administration, preparation, fact gathering, and due diligence, corporate reviews, travel on your behalf, attending at or waiting in court on your behalf, document drafting, consideration, and discussion regarding your file, and all communications and correspondence including letters, email, and telephone calls/messages.

We may also engage other lawyers and personnel to assist us in providing you with legal services and advice in a timely and efficient manner and the rates for those lawyers may be higher or lower than the rates listed in our engagement letter.

Our billing rates are reviewed from time to time, and are generally revised annually to reflect levels of legal experience, changes in overhead and salary costs, and other market factors. Use of revised billing rates to set fees on any account will constitute notice to you of those revisions and your acceptance of them.

In addition to our fees, our accounts will also include charges for disbursements which include but are not limited to: government agency and registry fees, long distance telephone charges, research and online computer services charged at our usual rates, courier charges, printing and photocopy expenses charged at our usual rate, transcript charges, witness fees, trust administration fees, file opening fees charged at our usual rate, travel expenses including mileage, and fees payable to experts and/or consultants.

In certain cases, where a significant third party disbursement is required, you may be asked to provide us with advanced funding or asked to make payment directly to that third party.

#### 5. PRELIMINARY FEE ESTIMATES

We do not provide fee or cost quotations. Any estimate that we do provide is preliminary in nature, is exclusive of disbursements and taxes, and should not be regarded as a maximum or fixed fee quotation. Fees for legal services are generally difficult to estimate given a wide range of factors that make it difficult, if not impossible, to predict in advance, examples of which include but are not limited to the cooperation of opposing parties/lawyers, changes in the facts and law, the volume and number of documents, parties, and witnesses, and the number and nature of court applications, discoveries, and trial days required to resolve the dispute.

{NA-04053345;1}

  
initials

A-04053345;1  
201892-45178737.1

**6. ACCOUNTS & PAYMENT**

We generally render accounts once per month for all fees and disbursements accrued through the previous month plus GST/PST/HST, though we may choose to render accounts more or less frequently given the particular nature of your file and retainer.

Our accounts are payable when issued. Payment in full is required within 10 days of the date that the account is issued. By entering into this Engagement Agreement you agree to pay our accounts as stipulated above.

We charge and you agree to pay interest at the rate of 18% per annum on any account not paid within 10 days, commencing on the 11<sup>th</sup> day after the account is issued.

We reserve the right to apply the retainer monies held in trust to satisfy unpaid accounts and further reserve the right to cease all work in your matter until our accounts are paid in full and a further retainer has been deposited.

If your case is going to trial or hearing, we will need a minimum retainer at least three months before the first day of the trial or hearing. The amount required will be determined once we are in a position to assess the length of trial, the matters in dispute and various other factors which may impact the cost of a trial or hearing.

If we are asked to, or are subpoenaed to, attend as a witness at a hearing related to, or arising from, our representation of you concerning this matter, we will charge you for our time in preparing for or attending the hearing.

**7. TERMINATION**

You may terminate our representation at any time by notifying us in writing. You will be responsible for payment of all fees, expenses, and disbursements for work performed to the date of termination and in connection with the orderly transition of the matter to you or another lawyer. If our accounts have not been paid in full at the time of termination, we reserve the right to assert a solicitor's lien over your file to secure payment.

We are subject to the codes of professional responsibility for the jurisdictions in which we practice. These codes list several types of conduct or circumstances that require or allow us to withdraw from representing a client, including but not limited to the following: non-payment of fees; misrepresentation or failure to disclose material facts; action contrary to our advice; loss of confidence between lawyer and client; and conflict issues.

**8. RIGHT TO WITHDRAW**

We will reserve the right to withdraw as your lawyer at any time, if in our discretion, we wish to do so. It is a fundamental term of the agreement to act for you that we will not be obliged to act for you throughout the litigation. Specifically, we will be entitled, if we wish to do so, to withdraw as your counsel at any stage in the litigation whether before or after settlement negotiations (if any), trial preparation, examinations for discovery, meetings, etc. In that case, we will still be entitled to a fee, which will be prorated. The reason we will reserve the

right to withdraw is that we do not want to assume the obligation to act for you if we cannot obtain satisfactory instructions from you or if we believe the amount of work involved is not feasible, or practical or economical for us to carry out. If in future we are required to withdraw as your counsel of record in the legal action, then we will file a Notice of Intention to Act in Person that we require you to sign in advance as a term of this agreement.

You will have an address for delivery on that Notice that complies with the BC Supreme Court Civil Rules. We will hold that Notice in our file. The purpose of this "pre-signed" Notice is for our convenience, so that if we need to file such a Notice, then we will not be required to serve you or make a court application or take other steps but we will simply file the Notice of Intention to Act in Person. Throughout our retainer, we will be entitled to communicate with you by email to the email address provided by you by regular mail delivery to the address provided by you. If you wish to change your email address, then it will be your responsibility to notify us of your new address. If your email or other mail is returned, then we will have no further obligation to take steps to notify you. However, you will have the obligation to notify us of any new address you obtain. You acknowledge and agree that this is a reasonable term and you accept it. It is a fundamental term of our agreement to act for you that you acknowledge, agree and accept these reservations and conditions.

You agree to sign a Notice of Intention to Act in Person in Form 111 prior to the Firm engaging in any legal proceedings on your behalf and you authorize us to file and serve same in any legal proceeding if we believe it is necessary and advisable to do so. You understand that your personal or corporate address listed on the said Form 111 will be used by parties or counsel to deliver documents to you and that you will be deemed to have received them when delivered and that failure to respond may result in your action being dismissed or judgment taken against you without further notice.

**9. FEE REVIEWS**

If you have any questions or concerns respecting our accounts, please feel free to discuss the issues with the partner responsible for your file.

We are generally able to resolve any concerns relating to our accounts with little inconvenience or formality, however in the event that we are not able to fully resolve specific concerns, there is the mutual right (subject to time limits) to request a review or assessment of the account before an officer of the B.C. Supreme Court pursuant to the *Legal Profession Act*.

**10. REFERENCES**

From time to time we are asked by third parties to provide client references or to provide a list of representative clients. Our professional codes sometimes require that we obtain the consent of our clients before disclosing that we have acted for them. By entering into this Engagement Agreement, you authorize us to disclose that we have provided legal services to you and the general nature of those services, subject to our professional obligations to maintain client confidentiality. If you do not wish



Initials

us to disclose the fact that you are a client of the Firm, or to limit any description of legal services provided to you, please notify us in writing.

**11. RECORDS RETENTION AND DESTRUCTION POLICY**

Under our Record Retention and Destruction Policy, we close client files pertaining to a particular matter within one year of the matter becoming inactive. We generally do not store material in a client file that belongs to the client once a matter has been closed. Any material in the file that belongs to you will be returned to you upon file closing as well as any original documents. The types of materials that belong to the client include: original documents in existence before the retainer; original correspondence from the lawyer or third parties; expert reports; client medical records; examination for discovery transcripts; trial transcripts; notes or recordings of conversations with witnesses or officers of the court; documents for use in court; memoranda of law; representation agreements and contracts; receipts for disbursements; and corporate seals.

We will retain and store any non-client materials (which may include copies of the client documents) as we choose for a period of 15 years, after which we have the discretion to destroy what remains of the file without further notice to you.

If you have questions about our Records Retention and Destruction Policy, please contact our Managing Partner.

By signing this form I consent to receiving electronic messages from McQuarrie, including legal and file updates, announcements, invitations to events and other communications. I understand that I may withdraw my consent at any time.

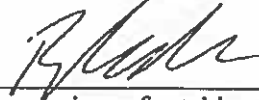


Michael Lares



Flying "L" Ranch Ltd., by its authorized signatory,  
Michael Lares, Director

This is Exhibit "B" referred to in the  
Affidavit #1 of Benjamin Morley  
sworn before me on this 16<sup>th</sup> day of  
May, 2025



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A Commissioner for taking Affidavits  
For the Province of British Columbia



thedevyndestinee

8

8:36



thedevyndestinee 10h  
From Create Mode

My heart breaks that the NEMALAH LOSER FREAK  
guy is still getting away with his BS. And now he has a  
celebrity backing him who has no clue as to what she is  
actually dealing with. She has known him for 2 seconds.  
Those of us who were wronged by him were VERY close.

As the other wronger has mentioned, SMOKE AND  
MIRRORS.

I am so sorry that I can not speak more on everything  
despite having police report records and many other women  
who have come forward.

His team of trolls and brainwashed betrays have 0 clue.

For those that keep emptying their banks to support him:  
I'm sorry that you are stuck on that hamster wheel of lies.

He is gross.  
He is sexist.  
He is repulsive.  
He is a toxic manipulative shytomaster.

Just know,  
The truth always comes out, and it's only a matter of time  
that he looks to replace his current fetish with his new  
Shamey celebrity.

He tokenized me as an Indigenous woman, and there are  
people VERY upset about that and how he claims to be so  
connected to Indigenous people.

If you take a look at the team of "strangers" he has now,  
they have a past that are far worse than ANY of the women  
who have voluntarily LEFT his toxic area.

I wish I could say more but I love my job  
and everything I am doing and having  
everyone thank me about what's being  
done. I'm so sorry I can't do more. It's up  
to the authorities and those who have had  
those experiences to come forward now  
and tell their truth.

Send message



8:36



thedevyndestinee • 9h



Remember this day..?

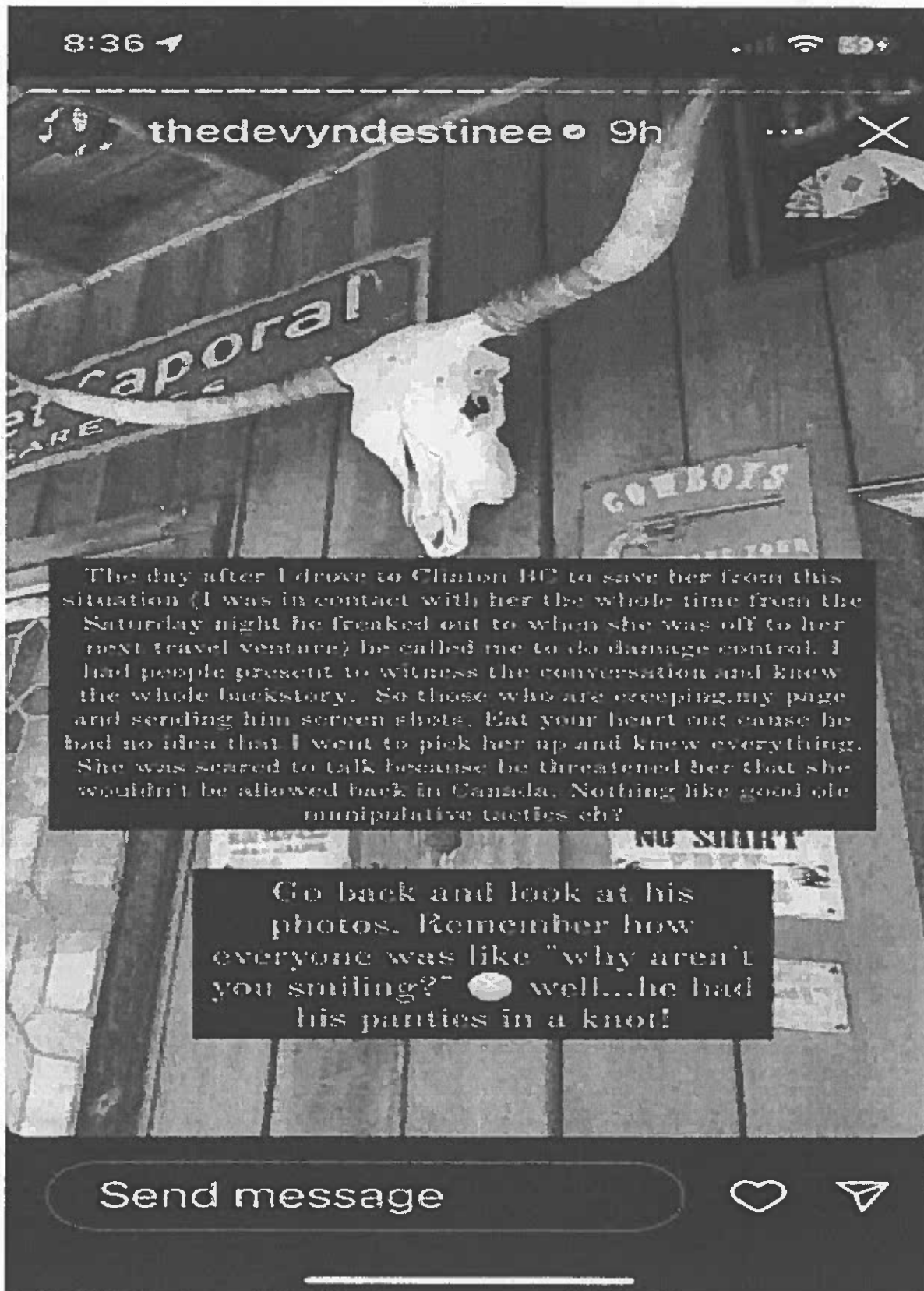
Do I have alibis?  
Yes. Yes I do. MANY.

Yep. On our way home from  
him dumping her on the  
sidewalk and lying to his  
following that he hooked her  
up with a healing ranch 🤔

Lies.  
This was in Savona BC also known as Dead Man's  
Creek. On the Sunday of WL Stampede.  
The cops waiting with E until I arrived. I was just  
outside of Clinton BC where he dumped her.  
I believe in women supporting women. His Shiny  
new toy woman has too high of a following and too  
many people know her, so of course he would be at  
HER disposal, not the other way around.

Send message







McQuarrie Hunter LLP  
Suite 1500, 13450 - 102 Ave  
Surrey, BC V3T 5X3  
Tel: 604.581.7001  
Fax: 604.581.7110  
WWW.MCQUARRIE.COM

Managing Lawyer: Royal J. Morton  
E-Mail: [rmorton@mcquarrie.com](mailto:rmorton@mcquarrie.com)

Associate Lawyer: Jordan Mario Jutras  
E-Mail: [jjutras@mcquarrie.com](mailto:jjutras@mcquarrie.com)

Legal Administrative Assistant: Barbara Poth  
E-Mail: [bpoth@mcquarrie.com](mailto:bpoth@mcquarrie.com)  
Direct Line: 604-580-7061

Our File No.: 240167

February 16, 2024

VIA EMAIL: [rewildranchbc@gmail.com](mailto:rewildranchbc@gmail.com) / [mrsdevynlouis22@gmail.com](mailto:mrsdevynlouis22@gmail.com)

Devyn McMillan

Dear Madam:

**Re: Instagram Defamation of Michael Lares and Flying "L" Ranch Ltd.**

We are legal counsel for Mr. Lares and Flying "L" Ranch Ltd. concerning the above matter.

We have reviewed either statements or other media, such as video, which you have either posted, reposted, or about which you have commented on the social media platform, Instagram. It is clear from the posts that you either authored, republished, or commented on, that you are unlawfully defaming our clients in the form of libel and may also be participating in a civil conspiracy. In either case, your false and defamatory publications necessitate that we pursue a lawsuit on behalf of our clients to stop this unlawful behaviour.

You are hereby put on notice that you must cease and desist from making any further statements about either Mr. Lares or Flying "L" Ranch Ltd. which in any way impugn their reputation. Should you continue to do so, that will only increase our clients' damages claim. By implication, Mr. Lares' family is also being maligned. We are instructed to initiate legal proceedings against you to recover damages and seek injunctive relief and recovery of legal costs.

Damages in defamation cases can run in the hundreds of thousands of dollars, or possibly even millions of dollars, for widespread, malicious, and ongoing defamatory publications. Many of the vulgar statements you have made about Mr. Lares assert that he has engaged in either criminal or violent conduct or other unlawful behaviour. These statements are false. The outrageous nature of some of your publications supports that you are motivated by malice. Public statements about our clients which were made maliciously will add to our clients' damages claim, including aggravated and punitive damages.

Given that you are self-represented, we confirm that we exclusively represent the interests of our clients, Michael Lares and Flying "L" Ranch Ltd., and do not represent your interests. We urge you to obtain independent legal representation. If you have retained counsel, please provide them with this letter.

Yours truly,

MCQUARRIE HUNTER LLP



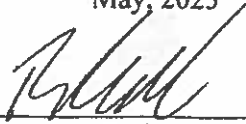
ROYAL J. MORTON\*

Partner

\*Royal Morton Law Corporation




RJM/bjp

This is Exhibit "C" referred to in the  
Affidavit #1 of Benjamin Morley  
sworn before me on this 16<sup>th</sup> day of  
May, 2025





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A Commissioner for taking Affidavits  
For the Province of British Columbia

2:40   






< oh\_alisse ...




 134 posts 30.3K followers 2,976 following

Alisse  
Renovating the soul... 

[www.elephantjournal.com/2021/08/we-los...](http://www.elephantjournal.com/2021/08/we-los...)

Unblock Message

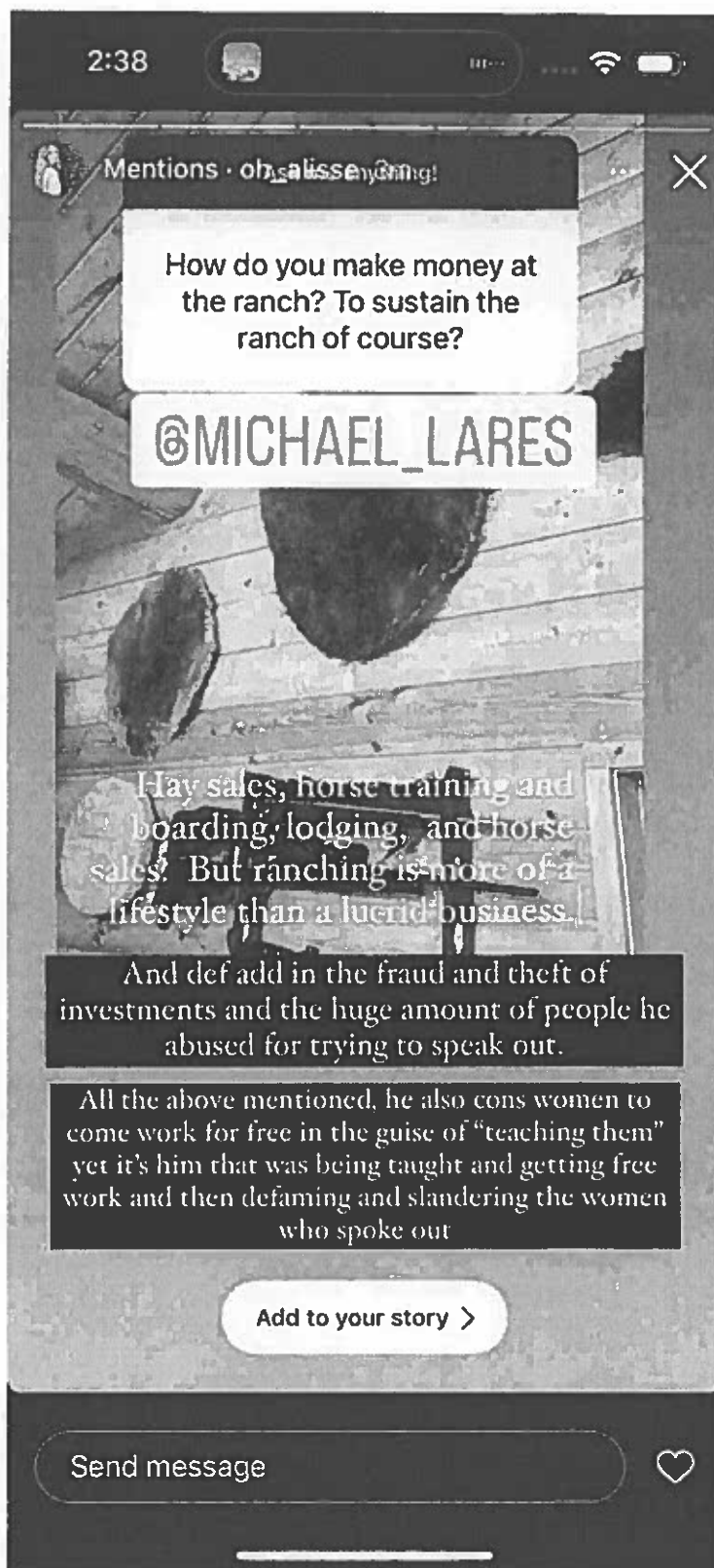
  



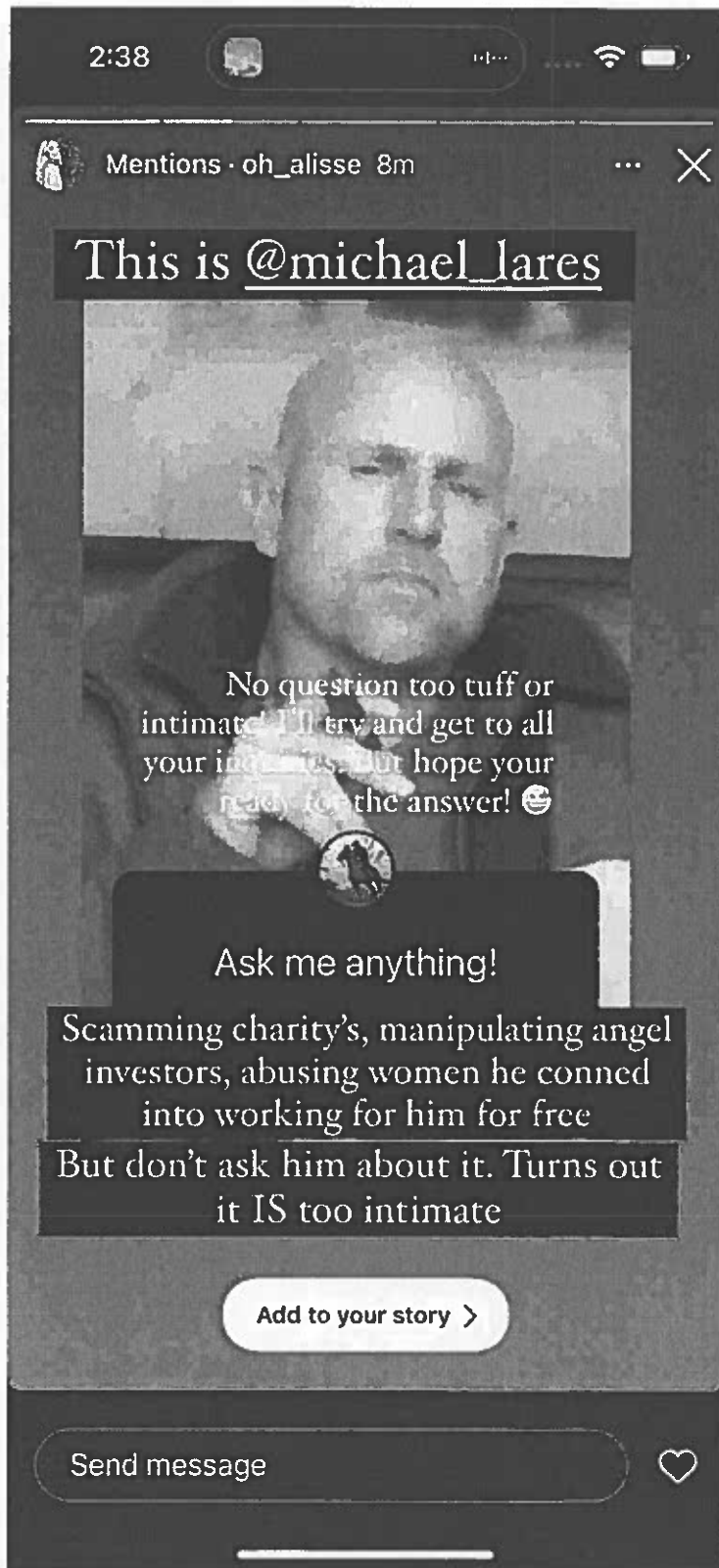
**This account is private**

Follow this account to see their photos and videos.











McQuarrie Hunter LLP  
Suite 1500, 13450 - 102 Ave  
Surrey, BC V3T 5X3  
Tel: 604.581.7001  
Fax: 604.581.7110  
WWW.MCQUARRIE.COM

Managing Lawyer: Royal J. Morton  
E-Mail: rmorton@mcquarrie.com

Associate Lawyer: Jordan Mario Julras  
E-Mail: jjulras@mcquarrie.com

Legal Administrative Assistant: Barbara Poth  
E-Mail: bpoth@mcquarrie.com  
Direct Line: 604-580-7061

Our File No.: 240167

February 20, 2024

VIA INSTAGRAM MESSENGER: oh\_alisse

Alisse Andrews

Dear Madam:

**Re: Instagram Defamation of Michael Lares and Flying "L" Ranch Ltd.**

We are legal counsel for Mr. Lares and Flying "L" Ranch Ltd. concerning the above matter.

We have reviewed either statements or other media, such as video, which you have either posted, reposted, or about which you have commented on the social media platform, Instagram. It is clear from the posts that you either authored, republished, or commented on, that you are unlawfully defaming our clients in the form of libel and may also be participating in a civil conspiracy. In either case, your false and defamatory publications necessitate that we pursue a lawsuit on behalf of our clients to stop this unlawful behaviour.

You are hereby put on notice that you must cease and desist from making any further statements about either Mr. Lares or Flying "L" Ranch Ltd. which in any way impugn their reputation. Should you continue to do so, that will only increase our clients' damages claim. By implication, Mr. Lares' family is also being maligned. We are instructed to initiate legal proceedings against you to recover damages and seek injunctive relief and recovery of legal costs.

Damages in defamation cases can run in the hundreds of thousands of dollars, or possibly even millions of dollars, for widespread, malicious, and ongoing defamatory publications. Many of the vulgar statements you have made about Mr. Lares assert that he has engaged in either criminal or violent conduct or other unlawful behaviour. These statements are false. The outrageous nature of some of your publications supports that you are motivated by malice. Public statements about our clients which were made maliciously will add to our clients' damages claim, including aggravated and punitive damages.

Given that you are self-represented, we confirm that we exclusively represent the interests of our clients, Michael Lares and Flying "L" Ranch Ltd., and do not represent your interests. We urge you to obtain independent legal representation. If you have retained counsel, please provide them with this letter.

Yours truly,

**MCQUARRIE HUNTER LLP**



**ROYAL J. MORTON\***

Partner

\*Royal Morton Law Corporation

RJM/bjp

This is **Exhibit "D"** referred to in the  
**Affidavit #1 of Benjamin Morley**  
sworn before me on this 16<sup>th</sup> day of  
May, 2025



---

A Commissioner for taking Affidavits  
For the Province of British Columbia



offgridlifeuncensored

Follow



8 posts 10 followers 4 following

Off\_Grid\_Life\_Uncensored

Uncovering the censorship and complete disregard for the followers that they keek milking for money.

POSTS

TAGGED



25 9  
Posts Followers Following

Michael Iares

Follow Message

No Posts Yet

Suggested for you

Florence Uri...  
Pee Dee Life  
Thur...

Follow Follow

Be on the watch guys! This



caleb.marmolejo and michael\_lares



### MENTORS

MICHAEL LARES HAS A LOT OF EXPERIENCE IN THE EQUESTRIAN INDUSTRY.

WHEN HE FOUND OUT ABOUT DAWN'S INITIATIVE, HE OFFERED TO BE A SOURCE OF GUIDANCE, QUICKLY BECOMING A TRUSTED RELAYING SUPPORT AND EVEN MAKING THE DRIVE FROM CANADA TO ARKANSAS TO PERSONALLY DELIVER ESSENTIAL SUPPLIES.

MICHAEL'S PASSION IS REPRESENTATIVE OF A MUCH BIGGER ARMY OF PEOPLE WHO BELIEVE IN DAWN'S VISION.

MANY SHOW THEIR INVESTMENT IN DAWN'S MISSION THROUGH REGISTRY PURCHASING AND CROWD FUNDING. OTHERS OFFER EXPERT KNOWLEDGE AND ACCESS TO FUNDING, FACILITIES, AND MORE.

DAWN IS NOT ALONE IN HER MISSION.



offgridlifeuncensored • Follow



This is the reason why Second Chance got the whole shebang and poor Hazel got put down without being seen by a vet. Today he was inspecting her wound, after being put down. Hazel got no meds, no vet, no chance. She isn't a money maker and even got her own fundraiser in her memory before she was put down. Shameful!!!!!!#hazelisthenewweiser #michael\_lares #flying\_l\_ranch #flyingl ranch. #dontownhorsesifyoucanttakecareofthem photo credit michael\_lares

14w



I think they should exam the body and do an x-ray of Hazel with that same machine

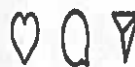


2w 1 like Reply ...

View replies (1)

View hidden comments

These comments were hidden because they may be misleading, offensive or spam. People can still tap to view them.



7 likes

November 8, 2023



Add a comment...



offgridlifeuncensored • Follow



offgridlifeuncensored Ok so I am baffled by this and of course if I dare to ask in Michael Lares feed, I will get blocked again cause we all know how much they love answering questions that don't kiss their rears.

So here it is:

1. Our horses are also free to roam and most have been adopted and were unhandled. But we spend considerable time with them and they know us. They let us approach and give them some love, catch them if needed, care for their feet and treat them when necessary. We don't need a chute. So it is very hard to understand the way these horses react to Michael.

2. I don't understand why Hazel needs to be put down. A considerable amount of money and time was spent on Second Chance for basically for the same issue. But Hazel doesn't deserve the same chance? Hazel wasn't even taken to the Vet or given a chance. Someone just messaged me saying he probably didn't even contact the vet. I guess Hazel is not as popular and a money maker as Second Chance and it is not worth it in terms of cost. Think about it, Second Chance got taken to a vet in Canada stayed there for a week, then to Wyoming for a costly surgery for a broken bone and stayed at that facility for over a month. Then another trip to Wyoming to pick her up, and then so far two trips to a local vet. Of course Second Change story is a money maker resulting in possible syndicated tv show, etc but Hazel is just a horse.

3 Michael iust can't helo himself and of course is taking



11,023 reproducciones

michael\_lares Sorry to say we have to put our Hazel down. 🙄



6 likes

November 7, 2023



Add a comment...

2:41

Today  
7:38 PM



0 25 9  
Posts Followers Following

Michael lares

Follow

Message

No Posts Yet

When [michaellares20969](#) posts, you'll see their photos and videos here.

Suggested for you

[See all](#)



Florence Unl...  
florenceunl...

Follow



Pee Dee Life  
peedeelife...

Follow



Thurma  
thurma...

Fol

**Be on the watch guys! This imposter is asking for money.**



offgridlifeuncensored • Follow



offgridlifeuncensored OMG 😂😂😂😂 this must be karma. Michael Lares warning that this other account is asking people for money.....as opposed to what? He requests money from his followers day in and day out, with no transparency as to how much is raised, or how it has been spent. Plus the money goes to his personal PayPal account and the link is always open to donations, it is never taken down. This person is just taking a page from Michael's playbook. Let's see if I remember just some of the asking Michael has posted recently. He has asked for money from his followers for his and his daughter's Amazon wish list, for hay, for fencing, to purchase two horses, for the vet bills of two cats, for pet products for the cats, for vet bills for the horses, to purchase a snowmobile that has never been used for what he said he need it for and basically has become a toy for his son, to buy hay, to build fencing, for his wife's medical expenses and helicopter ride, for supplements for horses, for the Weiser Strong Fund, for the Duque memorial Fund, for the Second Chance Fund, and these are just the ones I can remember. This all within the last six months or so. I donated to many of these until I realized things didn't add up and got blocked for asking one question. I advice everyone to only donate to non profit organizations that share the amount they need, share how it has been spent, how much was raised and then close the donation box until they ask for more based on a new need. Please consider donating to horse organizations like Skydog who practice transoarency and accountability. #michaellares



3 likes

October 18, 2023



Add a comment...

# The long awaited day...



offgridlifeuncensored • Follow

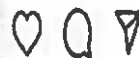


offgridlifeuncensored New trailer, new clothes, drone footage...shows the money they are making. I hope they finally stop milking the followers for money with no accountability or transparency. Like I always say donate to non profits only, where the money is not going to a private PayPal account that is being used to fund other things. I predicted that they would exploit Second Chance for money and here it is ladies and gentlemen, the show is on. Even the new trailer is part of the show. They did not haul this baby out of the goodness of their hearts, it was a business venture. Stay tuned for this money maker. flyingl\_ranch #flying\_l\_ranch #notransparency #censorfollowers #blockedforaskingquestions Photo credit Michael\_Lares

18w

View hidden comments

These comments were hidden because they may be missing, offensive or spam. People can still tap to view them.



5 likes

October 13, 2023

2,354

Add a comment...



offgridlifeuncensored • Follow



offgridlifeuncensored I just tried to post this on Dawn's page but it was deleted too. So I'm posting it here: @dawnolivieri hello Dawn I used to follow Michael Lares and donated quite a lot of money when ever he asked and believe there were many instances where he asked. I commented on something he was doing in a very respectful manner but not only did he not reply, he blocked me. This happened to so many people that now we have a group of people he blocked who followed him and believed in him. He censors anyone who dares to question anything. Of course he is entitled to do as he pleases but he also needs to be respectful to his followers and donors who helped him get to where he is. I admire what you are doing but I don't support Michael Lares and his censorship. His followers, including myself, helped pay for Sunrise aka the people's horse, hay and feed, fencing, his wife's medical helicopter ride, his cats spaying, Weiser's vet bills, his And his daughter's Amazon wish list, to name a few. He was constantly asking for followers funds. It is not right to just never answer comments beyond those comments that are like "oh Michael we love you, you are the amazing". These are the only comments that make it to his wall, the rest are deleted no matter how respectful they are. The rest of the followers who love those horses, have contributed to their well being, have been censored when perhaps things haven't been done right or could have been better and just point out that the horses are too thin or that Weiser needed urgent vet care that he wasn't getting. Instead of being appreciated for



Be the first to like this

October 10, 2023



Add a comment...





Recaudación de fondos para 3 Sisters Equine Re...

€54,16 recaudados de €2.708,01



68 Me gusta

3sistersequinerefuge Speaking of Mr B (accident prone old man). Here's an explanation from Dr Blake @bendequine about the treatment plan to address the invasion of bacteria in his tendon. Also an emergency visit on the weekend! Why do horses never injure themselves between 9-5?

Anyway, Dr Blake reports he was more comfortable



offgridlifeuncensored • Follow



offgridlifeuncensored For anyone wondering what transparency and accountability looks like, this is the perfect example. Notice the following:

- uses IG fundraising tool showing how much needs to be raised. Once that number is raised, it won't let followers keep donating. The money doesn't get deposited in an individual's private PayPal account.

- clearly explain why is needed, how it is being used and who the vet is. In the case we are discussing here, none of it happens. You are basically donating to someone private PayPal account but you don't know how your donation is being used, how much is used for the horses, and who the vet is.

- this is the first time we have seen proper vet care. The other vets who treated Weiser or Coco were never shown and neither wore gloves.

- if you really believe your donations is being used for the horses, then horses look so skinny, how come there no medical supplies on site, if a horse gets a laceration they are basically put in the river instead of treating the wound, have you ever seen another equine rescue do that?

- all the donations to the Weiser Strong Fund do you remember what you were told they were for? Well apparently all that has changed and all they managed to build was a tack shed. Where did donations go and what are they being used for? Do you know? Do you even care where the money you are so generously donating is going? With a vet so many hours away from the

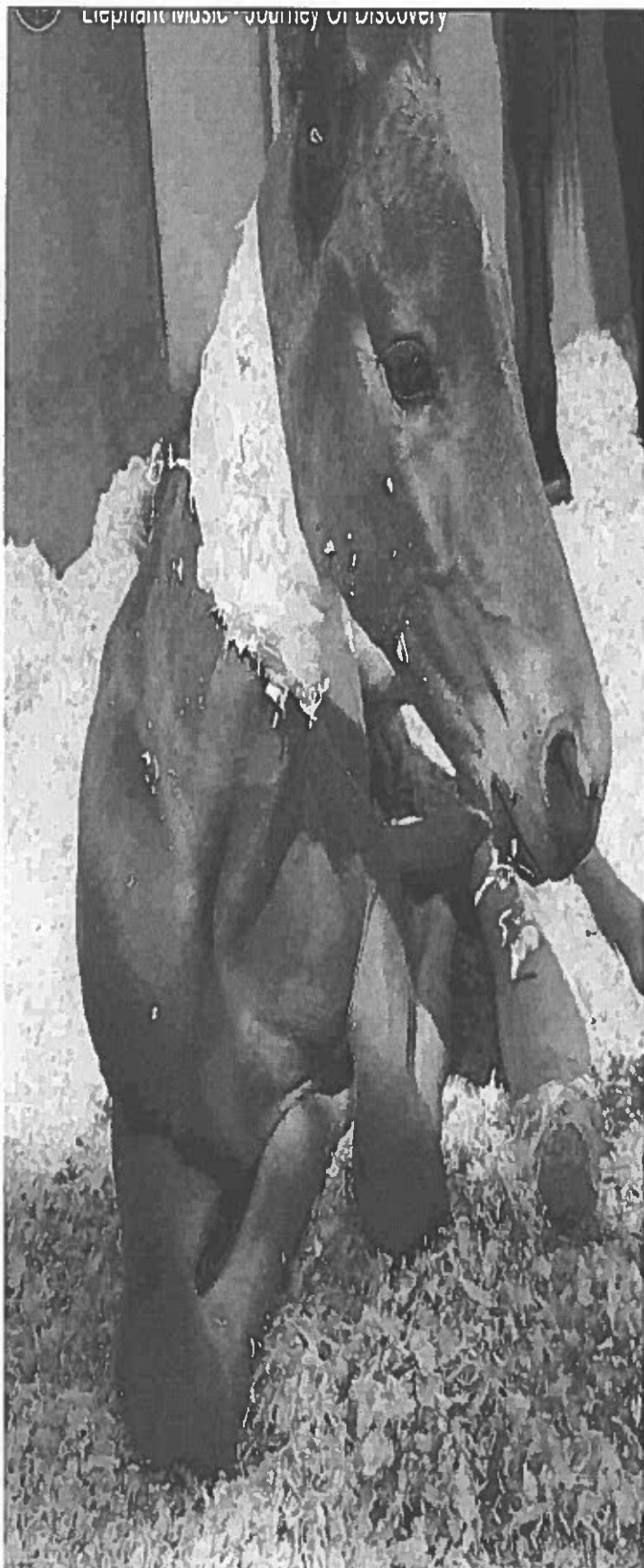


1 like

July 24, 2023



Add a comment...



offgridlifeuncensored • Follow



offgridlifeuncensored Photo credit Michael. Lares. This little foal is going to get his leg amputated. He is a 2-3 month old foal with his umbilical stub still attached. Shortly he is going to be taken to facility in the US to have his leg amputated. It will be all captured in IG lives and stories and endless donations will be requested in his name from bleeding hearts who don't question where their donations go to, how much is raised and how much of it actually goes to the horses. The person doing this has much to profit from this. This is not being done by a non-profit but by an individual who solicits donations non stop to his private PayPal account. This will provide endless content for months and months, will ensure more followers and endless donations, after all this person lives off follower donations. This seems atrocious but anyone who dares to speak up or raise questions gets deleted and blocked. No transparency, no accountability and censorship. Perhaps we have a more honest conversation here. What is your opinion? Is this about giving the foal a second chance or is this being done to create contact for an Instagram account and to make money? Is this even ethical? Please keep it civil and share your thoughts.

30w



realestatesalesbarcelona Definitely a publicity plot, they are letting him record the surgery must have come to an arrangement with the clinic. A discount or for free in exchange

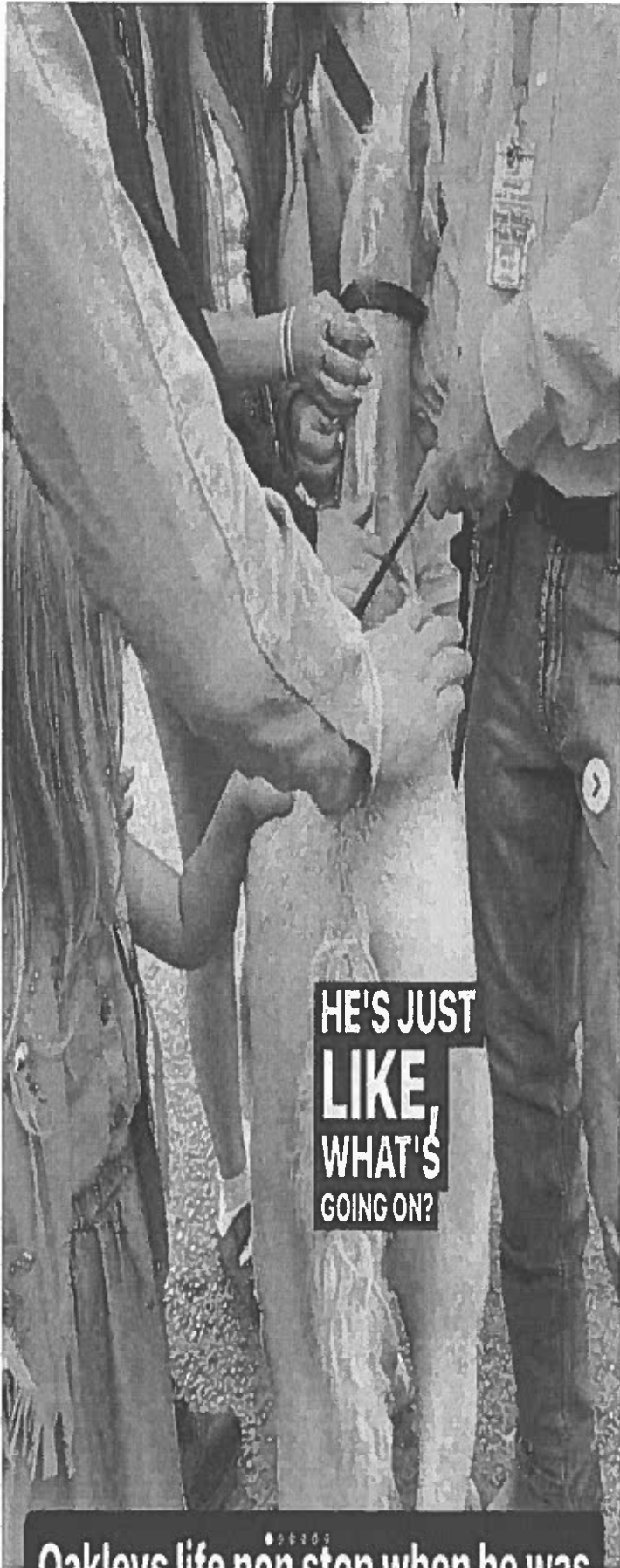


2 likes

July 19, 2023



Add a comment...



offgridlifeuncensored • Follow

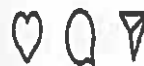


offgridlifeuncensored Foto credit Michael Lares. I got blocked for questioning whether it was right to put a one month old orphan foal through this. The orphan was suffering from diarrhea for two days, had no harness experience or had previous contact with one or two at a time. Yet he was taken by a trailer on its own to a stampede event and was held down by being surrounded by people all petting him at once. I got blocked for saying it ain't right. What do you think? Leave your comments here.

30w

 View hidden comments

These comments were hidden because they may be misleading, offensive or spam. People can still see the hidden items.



2 likes

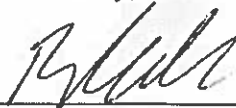
July 19, 2023



Add a comment...

Oaklove life non stop when he was

This is Exhibit "E" referred to in the  
Affidavit #1 of Benjamin Morley  
sworn before me on this 16<sup>th</sup> day of  
May, 2025



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A Commissioner for taking Affidavits  
For the Province of British Columbia

# McQuarrie

McQuarrie Hunter LLP  
Suite 1500, 13450 - 102 Ave  
Surrey, BC V3T 5X3  
Tel: 604.581.7001  
Fax: 604.581.7110  
WWW.MCQUARRIE.COM

Managing Lawyer: Royal J. Morton  
E-Mail: [rmorton@mcquarrie.com](mailto:rmorton@mcquarrie.com)

Associate Lawyer: Jordan Mario Jutras  
E-Mail: [jjutras@mcquarrie.com](mailto:jjutras@mcquarrie.com)

Legal Administrative Assistant: Barbara Poth  
E-Mail: [bpoth@mcquarrie.com](mailto:bpoth@mcquarrie.com)  
Direct Line: 604-580-7061

Our File No.: 240167

February 27, 2024

To Whom It May Concern

Dear Sir/Madam:

**Re: Defamation of Michael Lares and Flying "L" Ranch Ltd.**

---

We are legal counsel for Mr. Lares and Flying "L" Ranch Ltd. concerning the above matter.

To the extent you are a recipient, viewer or follower of certain false and defamatory statements or recordings about our clients which have been sent to you by email, please be aware of the following. The good reputations of Mr. Lares and the Flying "L" Ranch Ltd. are being tarnished by certain known and unknown online authors. By implication, Mr. Lares' family is also being maligned. Please notify us as soon as possible if you receive any publications impugning our clients' reputations. Please do not republish, forward or reproduce any such recordings, statements or emails. Republication of defamatory material could expose you to a lawsuit for defamation.

We will be following up with the authors of the defamatory posts in due course, as our clients intend to pursue those authors to the fullest extent possible, including seeking damages and possibly injunctive relief.

To be clear, any recording, or email, widely distributed, which tends to lower the reputation of either of our clients in the minds of a reasonable person is *prima facie*, defamatory, and will result in a lawsuit against anyone behind that.

Yours truly,


MCQUARRIE HUNTER LLP



ROYAL J. MORTON\*

Partner  
\*Royal Morton Law Corporation  
RJM/bjp

This is Exhibit "F" referred to in the  
Affidavit #1 of Benjamin Morley  
sworn before me on this 16<sup>th</sup> day of  
May, 2025



---

A Commissioner for taking Affidavits  
For the Province of British Columbia

## Notes from Devyn McMillan Videos

4467e05...MOV

- "unlike him who sits on his phone talking to women all over the world luring them to his ranch with all these big hopes and dreams catfishing people yeah I don't got time for that shit"
- "He's shitting himself Its fine its great I hope hes got lots of diapers"

61605 5,578KB

- I was his "I was his unpaid employee"
- I would get in trouble for sharing exciting news about my family. I would get in trouble for sharing posts from my friends I would get in trouble for promoting other businesses and he would have his pit bullies reach out and tell me that he doesn't approve of that".
- "Can we say narcissist one more time control freak yeah"

B7e1d 4,414kb

- "I personally believe you got a little Too money hungry"
- "you only see a price tag on people and when you are done with them you have a violent ending for them whether that be verbally violent, emotionally violent, you are a volatile human you cause mental health issues in every woman who leaves your ranch ask them"

All notes below from livestream on December 23, 2023.

3 30 26 PM.mov 167,992 KB

- "he said sorry he falsely delivered the I have what you need let me help you and I was like okay it was the biggest mistake not a mistake the silver lining is if I had not gone up there to do work and business all of that stuff that poor woman would not have had anybody who was willing to drop anything to go get her".
- The live ended, I knew it I knew as soon as I went live hed be like oh shit id better jump on my fake account"
- People have been noticing shit for a while, found about him through TV
- He falsely claimed he was trying to helped me
- "I did it I saved elise"

3 33 09 70,531KB

- I had to wait for his "true victims" like I'm not labelling myself as a victim I'm labelling myself someone who definitely got bamboozled and almost committed fraud with this person because of lack of understanding and lack of business sense, which now I'm going to use that as a PSA who meets internet people...

33511 59733KB

- "he sure got a kick out of me crying my eyes out every day and he sure got a kick out of me feeling awful about myself as I couldn't live up to his standards. This guys likes to make people feel awful. I heard from a very reliable source that he tells the kids in his family that they would

be nothing without them that they couldn't survive without him blah blah blah you know what that is that is control..."

33612 50979KB

- I asked him because ya know my husband and my family and I started talking why doesn't he ever hire guys what is the deal there and you know his answer "there is only room for one stud on this ranch"....
- Elise commented " he doesn't want any other man on the ranch cause, I quote " there can only be one stud up here"

33703 70,397KB

- "He didn't like that as it threatens his image"
- "you like to call and make me feel bad about myself every day..."
- "Lying about your research and all your stuff"

33812 99,188kb

- "so anyway this person made my life a living hell for the X amount of months I was involved with him. Like to boss me around like he was my daddy..."
- "you know why he didn't like that because he doesn't like a strong woman, he does not like somebody to have their own opinions which is why he doesn't like men around because men will challenge him unless he has got you in the pocket or sees something in you that he could value or use or advertise or make him look good he'll toss you out like a dirty shoe that's what he'll do"

34623 81,742

- "is how he neglects all those horses when we went up there the first time and I saw the big wormy bellies and the skin and bones and stuff I was like whats going on. You know and we were up there with another gets and she was like how does he pay for all of this..."
- "this guy breeds wild horses when there is an overabundance of wild horses running around and there is a stud program what is happening that makes no sense anybody who is in the horse breeding world and the equestrian world and all that kind of stuff people have questions if they ask him they get blocked..."
- "he will tell his inner circle who not to talk to he's done it to me he's done it to all the other girls he will tell people who not to listen to who not to talk to anything and do you think they ask any questions no because they know better than that they hit the block and delete button because they are told to do it"

34753 85757kb

- Reading a comment from Elise: "Lying about being a cowboy he attracts people saying he will teach them stuff during the few months they are there I have seen him one time on a horse holding onto the saddle horn like he has never ridden before"
- he knows nothing about horses, he was never on a horses

- He doesn't know anything about horses he wanted to feed them the cut grass left over from the he wanted to feed them the cut grass left over from the mowing lawn oohh.... You know that is a ticket to death city you do not feed horses lawnmower grass"
- person asked who are you talking about and she responded "you know who I'm talking about"
- we've planned a very exciting bonfire where we will be lighting up merch soaked in gasoline and we'll be making a reel of it for the world promise

34915 169935

- began story of Elise
- " I told the story yesterday I'll tell it again"
- They all went to go to the Williams lake stampede where elise was asked to dance by a cowboy... all reflected back on elise somehow... machoistic ego stuff typical can't take a joke can't take a dig has to throw a temper tantrum and has to kick the woman out of the country no sensitivity there whatsoever so anywho they are all out she gets asked to dance with someone goes out for one little two step goes back to the table michels gone for some reason stormed off super upset super frustrated how dare she go dance with somebody I'm supposed to keep her cooped up on my ranch forever, she's my prisoner beauty and the beast ship Stockholm things he likes to do that to people
- What happened after she came back to the table he texted somebody who was there with them tell lise she's going back to the room she's packing her bags and she's going back to France, his exact words text message proof
- Anywho that is what happened, so on this glorious drive all the way back to the ranch where it is three hours off grid no cell service no lights on the road all nothing but dark woods so it was burned so eerie and scary looking and this man comes unglued on this woman unglued to the point where she is so frozen can't reach for her phone cause you know what happens when a woman is trapped in a vhelice with a man raging at her that her...

35203 105,352KB

- Sitting there getting verbally assaulted for 3 hours, having her life threatened having him say nobody would care having her life threatened having him say nobody would care she was out of the country if she went missing in the woods nobody would be able to find her she would get dragged away by a bear,
- Said the only reason he wasn't kicking her ass is because she's a girl
- I'm sorry is violence the answer when you've had your fragile man ego bruised because she two stepped with one cowboy ...
- In the modern world a woman having boundaries is normal not in his world. Nobody is allowed to have boundaries around him. I established boundaries many times and you know what I was met with I was told I was egotistical I was told I had amnesia that was his favourite thing to say to me. And I was like you're fucked...

35343 130,076KB

- In this clip she got up to 102 viewers at one time
- "she thought he was going to murder her and rightfully so you're up in the middle of nowhere with this scary guy who just threatened your life and scared you away. He told you he was going

to feed you to the bears. Like that's pretty fucked up. And he would all he has to do is slather vanilla on somebody and throw them out. Maybe that is what happened to those horses that got claw marks on them magically. Do you know some people from that area thought that he did that. Very true.

35547 184803KB

- He told her he was going to dump her in Williams lake. So our plan was once he dumps you in Williams lake tell me where you are and I'll scoop you up....
- My intuition kicked in again I said he's going to change the plan and he's going to do it when you can't contact anyone if that happens as soon as you hit service... what happened after that that morning he knocked on her door time to go she very suddenly packed her things into the truck headed out that whole ride same thing cursing her under his breath being awkward and ugly... real passive aggressive stuff he likes to do thankfully when we hit service that he indeed change the plans he said I'm not taking you to williams lake and he kept driving through he wouldn't tell her he would not tell her I think for over a half an hour where they were actually going that is actually very scary for a woman who is out of country doesn't speak very good English doesn't know anybody in the country doesn't have anywhere to go has zero plans has nothing that he is going to dump her and not dump her in Williams lake the only country she knows in Canada sounds a little psycho doesn't it...
- I did receive a phone call from him doing damage control and it's the same shit he pulls in his lives... beating around the bush .... I just have to tell you I just had to cut the cancer out but he told you he wishes her well he would bring her to a healing facility.... He's hooked her up with a cool ranch no he did not he didn't tell her shit all. Other than how much he hates her how could you do this to me and my family blah blah blah after all we did for you we didn't pay you you worked for free I called you lazy and good for nothing all the time yeah sorry dude not okay.

35846 58232

- More of the Elise story, he said not stopping in Williams lake and doesn't tell her where he is taking her
- Not much directly defamatory

35942 78064

- Pickup happens not much directly defamatory
- When he dumped her on the side of the road there is a picture of her she has the picture cuz he sent it to her I don't know what his ugly game is with that but before I came to the ranch and any of the other girls that ever had to come to the ranch we had to take a selfie its so weird its like he has this sick stash of photos he goes to he probably has voodoo rituals on the I wouldn't put it past him
- He dumps her at a truck stop and I go pick her up and the cops were there we asked them to follow us out of town in case he was following us

40057 126784KB

- "will he get charged with anything I don't know we'll see what comes up are we going to charge him with anything I mean we could I could charge him with intellectual theft I have that proof too"
- Its not safe for elise and christie to say too much because of work things so they need to stay quiet so everyone please say quiet.... – WHO IS CHRISTIE?

40258 113965KB

- I think brain damage could contribute to his narcissism too not to make any excuses absolutely I totally agree not to make any excuses ...
- No wonder why you live in the woods because you could not handle the people because you couldn't control other people that is why he moved to the woods
- You wanted to exploit first nations land, first nations horses, wanted to make money you wanted to make easy money you wanted to do everything you could do to live for free off everyone else's hard earned money
- Before elise actually came to the country so he actually had reached out to me sent me her profile and was like can you check into this girl "she seems like damaged goods but Dylan might like her" yeah I think he might like her so he was like literally bringing girls over
- He was bringing girls over for his son to "get experience" literally literally literally when girls draw a boundary it's a big upset so

40446 112493KB

- (his wife) She may possibly be in on all of this or just completely tolerates it...
- Someone in chat asked her who? She responded by saying "Not saying who"
- Repeating that someone "calls all his horses "Shitters" he shouldn't be breeding these horses they are shitters..
- "as far as I know that foal he went to pick up I've been told they would not allow him to take the horse"

40633 111330KB

- Uses horses to bring money
- "I'll send you my merch to burn" – commenter
- I have a big bonfire I'm planning we're going to soak everything in gasoline but first we're going to parade it around we're going to be petty as fuck and I don't care because I deserve it I deserve this last laugh I know I do
- At night if he's ever responding to people at night just know he's drunk on white Russians and if his spelling is off he's wasted and he's angry its when his true colours come out.
- Ill parade his merch and stream burning it with Elise

41026 142068

- "she's in the middle of nowhere being threatened absolutely by a military guy! Like you don't screw with them they are specially trained for all sorts of things which is probably why he is so good at manipulating they can manipulate people into talking into asking questions they can do all sorts of things like that. That is their training. Literally."
- She's reading out a lot of comments,

- Stopped the car and got me to get out I thought he was going to kill me
- He won't bring in hay hasn't brought in hay last 3 years
- I honestly got every sign that he was going to murder me – elise commenting
- He could definitely be charged
- When he eluded to elise faking recovery from concussion is unforgivable
- “And he was giving you signs that he was going to murder you. Even like the messages you sent me and then I screenshotted those and sent them to the people who were looking out for me they said the same thing that he could definitely be charged.”

41243 138503

- Comment it was all mental manipulation and torture tactics from the military – her response 1000%
- “He gets off on it” errifying her
- He is textbook spiritual bypasser”
- “He’s like smegaul”,... “one thing goes wrong and he is like aagghhh”
- No wonder he doesn’t pay anyone on the ranch” so like say he wants to kick someone off the ranch, oh you need me as you have no money”
- He lied he didn’t hooked her up with another ranch... he didn’t he dumped her in a town she didn’t know
- Have screenshots from conversations at those time, other people have screenshots, of course I have people they are witnesses to this
- Didn’t she go to the big ranch, “she was safe there” she went around to a few places, she went and did the real things got all that done
- He plays it off like he’s this playful fun character when really behind those words he’s actually cussing them demeaning them and actually telling that to their face....

41455PM 133,865 KB

- A picture creepy, is it his way for him to say he left them alive – her response “yeah probably totally dateline stuff”
- Everybody not knowing the history he straight up told me about all the women that he deemed crazy who used to work for him and that they were loony birds they were psychos he had to let them go he had to “cut the cancer out” if that many women had to leave on their own terms in that kind of way and I witnessed him saying that that to me was just like that’s what psycho guys say about their girlfriends that they couldn’t handle and psycho controlling manipulative guys say calling the women crazy if you have had all of your girlfriends leave you and they were crazy...” maybe look if you are the problem
- Exactly what military friend told me pic was “proof” to say he didn’t kill me – comment – her response 1000%

4 17 01 60052KB

- German couple left pretty unexpected –” cops showed up that day too Kirsty left cops showed up everybody was like is everything okay... no... there were cops there yes there were”. Kristy, there were cops there,

4 17 59 135,599KB

- When we were on the phone with Roger... he asked do you think he did this and we were like we we don't know.
- If people how did that happen, how dogs not barking, and that's what the chief said how come nobody knew interesting
- Whats the deal with steel? I had made my exit at this point my friend training him no idea, our friend came to visit had no idea, I told him if you want to continue a cordial acquaintanceship I guess you could say I'm willing to do that but the business and friendship ends my exact words. he called me egotistical I told him what he did to me was intellectual theft he said I had amnesia as if I signed off on him to just take my whole proposal and use it for his own self to do the wiser strong, but apparently krisitn davis is supposed to fully fund
- He reaches out to celebrities claims best friends I don't know people drink the cool aid right

4 20 08 132, 139KB

- While out to ride posting saw me in same story with friends went out for ride he didn't like it calls friend throws a hissy fit "He's obviously perfect to ride I'm coming to get him".
- Girl well respected who rides thoroughbred, training level steel had was greenbroke not for everyone still could be riks, so anywhoo he threw a hissy fit that we were out riding together after I told him we were true, he though we were conspiring
- He's the one caused the drama funny for me
- Had sit down when best friend and I not screw with business
- Fragile man ego got upset again and threw a hissy fit again

4 22 47 44,1116KB

- "I'm telling the story of the evil bad man I used to work with and the woman I had to go rescue"

4 24 12 183,890KB

- With Steel after saw us post to Instagram freaked out called friend cut training short, he was not ready to go back, tried to do bad buisenss as tantrum, took horse and then exchanged out 2 more horses,
- Why steel went back early
- Was he supposed to be pack horse, lies, not true, trainer is amazing trainer, had he completed training what happened to kristy might not have happened,
- Now we have missed it the "truth"
- "I have to be like Denarys right now"
- I believe if we continue to bypass behaviour like this never stop ugly men like that fear powerful women like the women that walked away from that ranch

2 26 49 105,142KB

- Why does he take donations for certain things that other angel followers have already paid for
- If he has Kristin davis funding him why the hell is he asking people like he said his favourite types of people to ask for money for are people .... Hooked up to machines in hospitals have no family but lots of money like that's why I told everyone to watch killers of the flower moon... that is

literally this guys MO I'm not saying he is killing people and taking their insurance people he finds people infiltrates their lives he finds weaknesses find everything about them someone ....

4 28 28 100,238KB

- Why are you asking the average joe poor helpless women that trust and believe in you that is so skeezy
- Kristy started seeing too much and started asking questions and he started revoking things from her and she decided it was time to get the hell out as he didn't fulfill any of the promises he made she was supposed to be there homeschooling with kids with another family.... Something fell through.... Basically he just dangled a carrot too good to be true, he makes promises people I thought go up to meet, found out not coming, those people actually hate him and they never intended on going and never responded he lied to get me up to the ranch
- "vet hasn't been up to take care of sunrise"

4 30 04 114, 054 KB

- He has a stud which is so funny., best part, comes from someone who was on that ranch, knows everything about sunrise and everything about breeding, did you know that sunrise is only ¼ horse and is not wild wild, what he is trying to advertise to everybody I found out that he's like quarter horse
- There is agreement if everything to happen I'll steal bolt, make sure elise gets bolt
- Kirsty steel, I was only taking him out to reach the wife to brush him and teach him to ride him
- Goes back to the donation dollars Every time she has to get airlifted out you guys pay for it

4 31 52 65,115 KB

- How he rides like his getup ridiculous...
- He has big hopes and dreams of turning that whole place into a tourist destination
- He reached out the Woman in his TV show he asked her same thing she said fuck no he was expecting her to do a lot of work for free too"

4 32 54 80, 330 KB

- If wife in hospital asking for more funds
- When she got sick when we were up there and had to be airlifted out he made snide remarks to my best friend saying that it was her baby that caused her to get airlifted out so everything is everyone else's fault its textbook narcissist

4 34 44 64,779KB

- Sickening that he preyed on sick people in hospitals "absolutely 1000% that was what he told me my best funders are people with no family" do you know what he tried to do before elise came to this country he made sure she alienated herself from everybody she showed me I saw the text messages that were exchanged between them... had text messages saw, ....I saw it all

4 35 47 56,949KB

- I know who knows because I know there were possible business deals going on so if they did say anything or do anything they would have to keep everything in close quarters and quiet now as

there might be legalities around that shit too who knows if the vet clinic wouldn't give that little foal back to him who knows what else is going to shit in his life right... This is all stuff he did to himself to his own damn self...

(BEN'S NOTES) 2024-01-09 beginning at 3:22 Intake

Ask barb where to save these

201892 make sure name of potential client in name of save

Defamation case

M = Michael Lars

R = Royal

R: intro purpose is to get overview of problem tell you if can help you and what is involved in getting us retained think about it and decide if you want to hire us, sounds like a kiristy, alise, Jonathan and one other person, and jimmy, and those are names you have and they are saying bad things about you, we would have to determine if in law they amount to defamation and if you have a claim to sue them for defamation and stop them from defaming you

R: let me say that in this call all I can do is get the Gist of what these people are saying, I have summary here, I have only glanced at some screenshots that Barb obtained from text messages with Devin, are those text messages between you and devon

M: all between themselves,

R: between devin and who?

M: uhhh, janathan guy I tried on business venture in summer and have 17 minute recording and conversation

R: I havent' listened to that

M: I'm just laying groundwork for what is going on

R: you own horeseranch

M: in memaya valley west of Williams lake,

R: amongst some indigenious groups?

M: correct, we are island, few tracks of land, and surrounded by native title land

R: what is that like,

M: all about relationship we have great relationship which these individuals are trying to ruin

R: kiristy

M: former employee supposed to move here but never worked out

R: other girl,

M: here for month, injured herself got herself a concussion, at that period she couldn't work she just laid around and took advantage of my 17 year old son, had sex with him she is much older, she ended up

showing her fangs and I removed her from the ranch, she turned on us, and I brought her up to the ranch, next day we left, I took her back to Clinton options gave her options to work at ranch down there or check her into a hotel enough of her drama, she was unpaid intern, workaway

R: Jonathan steels he was former employee?

M: he was introduced to collaboration with the states, tv and film stuff, they are trying to mess my name up

R: aside from running horse ranch what do you do with tv

M: produce tv series at ranch, working on other productions with other productions, high social media and film presence

R: who do you produce these television productions for,

M: history, appn, working with a couple production companies now, industries changed but that is what we have done in the past and what we are currently doing,

R: why would Jonathan steels or devin or kiristy would say bad things about you

M: devin was follower that started harassing me about buying horses, Devin lamar is female,

R: I have a devin two different devins?

M: devin lamar and devin Mcmillian

M: devin Mdcmillan she, and devin lamar is also a shee

R: which devin is a follower,

M: devin lamar I blocked and then she went on the warpath, called animal control on me,

M: Jonathan Steel called RCMP tried to get me arrested interviewed Kiristy, found no merit to accusations so they closed that file< I am popular man in electric creek they keep coming after me, and I sent you guys some emails and recordings accusing me of very terrible things that are all lies threatening to kill alise, and RCMP found no credible things

R: one thing I always have to ask is it is important that Defamation cases are very very legally technical that it is surprisingly complicated area of the law for example there are many elements to the claim that you have to prove to get money out of these people or they should be ordered to stop doing what they are doing, online is Libel, verbally that is slander, but in either case exactly what they said and what you would assert those words to mean is the starting point those words have to mean they are saying something that a reasonable person would think harms your reputation and then it has to be not something in public interest but also interests of malice, if saying something defamatory, to this mythical reasonable person, the big question is whether ultimately those words are false, whether it is false and that is important because someone could call you child molestor but if criminal record but that is where it can get complicated so question do these people have any income or assets to make them worth suing that you know of

M: yes,

R: can you tell me who may have income or assets that would give us pressure

M: devin Mcmillan, Jonathan steels though a bit of a nobody, he is tangled up with finances with his dad, I don't know, I had him investigated when he started becoming a bit of a problem

R: what about others or are they not much

M: other than what parents estate

R: not much in terms of recover money, not worth suing in that sense, is do you want to stop them doing what you are doing, or is it possible they have money in the future, get temporary or permanent injunction, must remove defamatory posts, and thou shalt not post anything more things like that

M: yes, Jonathan steels, my business with him, he just kinda pumped me up with a bunch of promises to sponsor a bunch of things we are working on all in whatsapp, information don't want us to spend money, get all sponsorship, at the end of sponsorship, he couldn't bring it in I ended up spending 60k trailer camera equipment, camera crews paying for website, I want to go for him for 60k in any way possible,

R: that is either breach of contract or misrepresentation that has nothing to do with defamation, want you to pay for that that goes to question, money do you know if this person is worth suing, spend 20k to get judgement says devin owes you money if no assets then hard to collect, dry judgement, no jail time if they can't pay not for a long time that is might be 1900s its effectively archaic system, get 60k judgement but if not only assets or seizable assets, that you can seize or attach that judgement is worthless, if regular Job you can garnish wages to certain point, if own home that is the best as register judgement on title, pay money or sell home, keep small part of home.

M: is there a way to teaming up after me, recording after recording of them gaging up on me, is there any way to tie this judgement together

R: there is a civil tort of conspiracy, where people are acting in concert to damage you, but knowing damage may occur from what they are trying to do,

M: that is what they are trying to do

R: we might be able to make it out, did want to ask you what the nature of what they are saying, to say they said bad or vile thing ot you legally irrelevant, for example exact words were that "you have been accused of taking advantage of people in the hospice, killing horses on your ranch", very specific things if false may make out defamation case where there is no good defence

M: accusing me of fraud, saying hes lying about non prof, threatened to kill alise, threatening that my family are prisoners, taken passports not allowing them to leave,

R: did you happen to get RCMP file numbers

M: one file number when Jonathan was threatening to come to ranch we have ongoing file at RCMP on all these reports from Jonathan, gone for hours with RCMP constable, can't give you advice but need representation, me being hostile with family not letting kids leave,

R: that gives me gist of it, one of the highest form of defamation accuse you of criminal behaviour, question then is organize and summarize, potential pleading and document what words in what forum

you should go after them for, brings me to my last point here, for folks not in possession of much income or assets I often say some of the words litigants are either people who have a tremendous amount of money and waste yours and people who have no money and nothing to lose, no idea what they are doing as they don't have legal representation have to make decision, partly a business decision whether you want to hire someone like me as defamation interesting part of my practice, legally interesting but clients I represent are never happy to pay me to protect representation but suing people who don't have much investing money, but even if ben to get a lot of legwork, my rate is 540 hours and that can add up very quickly if someone opposes or says everythings true and I'm going to prove it, if possible nothing to do with them and they go away, that can be better alternative, putting pressure on them money forcing them to spend that it may get them to shut up but I can't guarantee that and my minimum retainer is 12k initial investment for me and ben to go through everything to sift through and distill it in claim that is manageable that can put it into something less than 10 or 15 pages, always proceeded by cease and desist letter, this is defamatory, sometimes ask for public apology, from municipal council in whiterock had reason to apologize to not get in more trouble, partly business decision, take up time bugging you with interviews and time, and can't get around that it can be time consuming to get cease and desist letter, and if they want to be difficult have to be prepared often use example to go to war to get diplomatic resolution, form of civilized warfare make life difficult impact not their freedom can't get them thrown in prison, that is business decision you need to make as in this call other than general information no legal advice until put time in that definitely is criminal and defamatory and if you say not tru

M: problem is coming up with all lies here, this Jonathan guy, he's from an Vancouver not allowed into US, so not allowed in US, just got time on his hands, alcoholic, tried him out for a few weeks disqualified him pretty quick, cost 60k to get out of false promises, now he cannot stand fact that he has been removed even the TV starts have blocked him from their media, he's got some attorney in Pemberton, some attorney in the UK that he CC's don't know if friends, I blocked him before Christmas,

R: any presence in Canada

M: stays in dad's house he's a bit of a nomad, has vehicle

R: he sounds like someone that unless presence here, he may not be worth suing in the sense if using social media name social media companies as defendants, write to social media companies, get removed to get him blocked but against him personally difficult to get remedy if nomad no place in Canada that we can serve him

M: that is a matter of definition a cease and desist would be nice,

R: does he have email

M: privileged white guy, ceased and desist may shut him up

R: I appreciate what you are saying, doesn't carry much weight in court, our courts in civil claims based on merit, pretty good case, if case has merit, they could blame it on you privileged all they want if they can't prove defamatory statement doesn't matter who they are have to shut up

M: evidence efile, his Instagram community violation, lies, awful, its sad to see, all these people I tried to get work but didn't work out they all got together, didn't carry any gravity until this guy found them all

found girls working here trying to get him off, now he's trying to be spokesman for these girls, laced with false accusations to me, noticeably him getting drunker, mass emails them to 18 people,

R: does he ever come to Canada at all then he might be worth suing, you have to decide to investigate the time and money to listen to the recordings give you opinion, yes or no, and then start going after these folks, other thing I could suggest is ignore or avoid them but it sounds like you haven't been able to. I have to end call now but why don't you take time and think about it. Need certain things filled out then start plugging away. Send you boiler plate agreement she could get you that some time tomorrow

M: I am not a big name, big people in industry, famous down in states they say welcome to our world need a big attorney, this might be growing pains.

R: how long in industry

M: 3-4 years had ranch for 13 years, we attract some pretty terrible people

M these guys toxic, quieting down now, but Jonathan scares me, he's trying to ruin my name sending audio clip to my own producer, including people I'm doing business down in the states, that is ridiculous, they don't believe that, but for him to do that I need to shut him down, think about it, standard agreement. Is he too out there and can ignore.

2024-02-06

#### Flying Ranch

- All stuff sending
- Is royal planning getting cease and desist
- Reporting them to Instagram something in privacy settings not allowed to do that unless legal notice cease and desist
- Report people on Instagram, accounts frozen or put on hold
- Review docs, will print and get them to me
- Only way to do that is letter from royals office
- Once review everything
- He's got these, if you go in here
- Will get printed documents for my review Thursday evening so I'll be able to start reviewing them then.

## B – Notes from Document Review 2/12/2024

## Devyn McMillan

- Livestream see “notes from Devyn McMillan Videos”
- “I could show you real life business conversations and exchanges... but I better leave that to the feds.... What E, K and I experienced was a NEVER MEET YOUR HEROES moment. He wants to be so famous... bet he didn’t count on it being a crime DOC”
- “ Maybe all of the women who have been hit on by HIM need to start messaging his wife and coming forward. I caught onto what HE was doing.... He PUSHED me to start a nonprofit to “funnel” money. I brought this to my admin team and they let me know that that was VERY ILLEGAL CUT TIES> So after I rescued Elise, I made my exit....
- “When HE is done with a woman who asks questions... HE dumps her and flips the script to become the victim. HE quickly goes into “damage control mode” to silence the people asking questions and makes up false stories to make himself seem like a savior” Literally the oldest trick in the conman book lol”.
- “I have many witnesses and alibis to HIS toxicity.
- “the owner IS 10000000% to blame. His fragile ego and toddler tantrums and immaturity to deal with people in a professional manner is why steel came home early. Buddy threw a hissy fit at Steels cost...”
- “oof. Screenshots suck don’t they. Here... I’ll give you more rope” when referring to what appears to be our clients picture, which suggests that he was watching Devyn’s livestream.
- “ 3 sisters affiliated with the ranch had sketchy things go down and the truth is coming out. He is sitting bricks and the rest of the world.. the ones who are not victims to his manipulations, they SEE it. Not hard to make the puzzle pieces fit.

## Kristy McQuade

- Sheloshb.sk appears to note that whenever they ask questions on our client’s livestreams Kristy responds
- “if you live for accountability not sure why you follow the ranch”
- “Dirty is using animals to pull peoples heart strings to line your pockets – the truth may seem dirty for some.
- “ya I wonder where that hay is!? I saw the money come in and I saw an “angel” donor match and double that fund That sure is a long delivery time isn’t? Things that make you go hmmm”

- "All I am saying it's not all as transparent as he claims I was payed to house clean his social media and delete negative comment and block people that questioned anything."
- "where is the hay?"

#### Devyn Lamar

- "let's see if that's true then how come not one person has ever received a receipt. If u make a donation to a rescue or a real non profit it's all up front everything and we spend hours doing receipts for tax season. Every dime is included...."
- "you can think I'm a troll as Michael calls me, that's fine. I'm just an honest person trying to bring aware to the good followers to at least think for themselves. There's reasons why in 3 years and over 100k has been brought in for hay buy not even one square has been brought in. you can research him yourself it's...."
- "update on the above I found the right person to help coordinate, I found and called Jonathan Skeels...the cops have re-engaged on all fronts, the Canadian Tax Revenue agency is opening an investigation and the correct people at SPCA in Williams Lake are reopening the cruelty case based on better provision Evidence. You are platforming a monster Dawn. And your validation of him brings in more victims to his scams and abuse. Jonathan thinks the only reason you could hear all this and continue is either you're dumb as fuck or Michel has taught you his scams and you're enjoying the money flow too." – **WHO WAS This to? (DAWN?)**
- "... I was trying to protect u from getting involved, nut y chose for some God reason, maybe Michael said something to you, but to not to listen to me. So now, when I speak to the police tomorrow, your name will be attached to his. I'm very disappointed in you. Thought when one women gave you an honest heads up about more than you know, u would want to listen up, but instead u mocked me. This will get out and will go public now. I will see to it. And your name will be with his.... Thus is not the end, but the beginning. 4 different agencies, many ppl, and a crew of workers now. Deven Lamar
- "That Jonathan Skeels was able to coordinate all the right people into all the right places.
- "Or poor hazel she died I believe by his hands his story made no scense"
- "let I'm the truth is out. He wont talk about it cause it's true. Funnyhow only young women go to the ranch and they all leave with the same story. He's scared. He ran from NC last time. He's not getting away to turn around and do this to someone again. Not only do we have a great team of ppl working on this but so many followers have been reporting their own problems and concerns. And thank you to each of u that stood up and contacted the royal Canadian mounted police. Its amazing. And with us all working as a team this will end soon and have a happy ending.

- "Oh for the record my name is Deven Lamar I am not devyn destiny we are 2 separate ppl. You know nothing about me. I say these things to u cause I see potential and good in u. Woman to woman I believe in honesty By doing all this I have nothing to win and nothing to loose. But I believe in doing the right thing. If your learning from Michael it's the wrong thing trust me. I will see him pay for what he has done to all those great supporters, his kids, the 3 horses he killed, and all the rest he has done. Money laundering Tax evasion Fraud. Look it up at irs-non profit every one in rhe world is on it no Michael Sexual abuse Threatening to kill or to do bodily harm The list goes on. The royal Canadian mounted police have a case internal revenue service has a case Bc aspca has a case and 2 more there are 5 people collaborating this and hundreds of followers..." -- WHEN WAS THIS SENT AND WHO WAS THIS SENT TO?
- Ya he is dumb. No hay so he has to fundraise for hay to be brought in 3 years still none. But even today he had 12 bales in his truck to sell. Make any scense to u. Have u ever seen any account totals or how much has been donated, or a receipt, your paying for this stuff be more demanding to make sure it's going where said money is for. Where's the 5 grand from Hazel. In his pocket. He's good at this cause he's done it his whole life".
- "he got over 4000 for Elise and she didn't get a dime"
- "... the royal Canadian mounted police have had so many complaints about him this past year. Funds not going where they were to go he's made threats to ppl cause he's not nice. Not yo mention NC. Its all adding up. And his time will come to an end
- Posted a "Government Watch List notice" which stated The federal government maintains a list of names of people who may be associated with a known suspect, are a known suspect themselves, or are under "reasonable suspicion" of involvement in a an extremist group or terrorist activity." Then in a separate box "Did you know? If Michael Lares's name appears on a government watch list sourced by the Federal Government or another government agency you will have access ot the details associated with this record".
- "After 3 years of speaking to him several times it's not hard to see wht kind of person he is, but I have a shovel let me help u. U don't sacare me I eat ppl like u for lunch be off fairy. And why the need to hide Nichole if your not liars and scam artists, take off the mask u hide behind you fool only yourself I'm here anytime u choose to have this out good against evil come on it past Halloween so coume out and play looser"

#### Andrea Prescott

- "and I am not being jaded or vindictive. Im not even giving the 100% story. Yeah at first my ego was hurt after thinking there was something wrong with the internet lol. But what hurt me lore were the dozens of people messaging me because of what happened to them. For these people I feel really bad. He was hurt and thrown away a lot of good well meaning people. I do get that he deletes someone threatening or lying etc but this is not the case"..

- This was under Andrea Presscott's folder in the file by the client but not clear who posted – **CLARIFY WITH CLIENT:** “this is the post of a 60 year old man who arbitrarily blocks older women who have donated for years for the true sake fo the horses. He is hurting a lot of women while spinning a lying narrative. Sadly the only time you will believe is when it happens to you. P.S. I am not bitter. I am angry for those who have been hurt by this person. Hurting innocent people and animals does not come eithout consequences”- resharing one of Michael Lares posts and commenting that overtop

#### Jonathan Skeels

- Reached out Chantelle Edwards In October which he said he also sent to the first nations partner on my wilderness lodge project in the chilcotin, said he was suing Michael to recoup more tha 45k said concilor Junior Lulula form Xení Gwet'in was skeptical of the “americal playing fake cowboy”
- Claims RCMP are concerned and doing a welfare check,
- Claimed Michael abused and berated Cody at a Wyoming Hampton in and has refused to return the cameraman's personal content form the road rip hard drive that michel “absconded with”
- is apparently stalking Chantelle edward's boss
- Contacted the Xení Gwet'in First nation... **Need more of what was said to Junior**
- Alleged “legal documents” that don't make sense, **NEED FULL COPY OF THESE DOCUMENTS**
- “Legal documents” were sent to Kristi Coluccio, and other followers of Our client circulating via Direct messages

#### Abbe\_dae Who is this?

- “what bothers me more than anything is he things he can treat woment he way he did and it's not on him!! PREDATOR!! I will never follow someone I know that acts like this.. Mike you've got a lot of new followers that haven't watched you for the last couple of years! Just leave Dawn alone...
- I'm taking my money where I know it will benefit the animals!”
- “Mike's a Dishonest Person”
- HEY MIKE! I want my money back that I donated for Elise medical! You're a theif! It's under DEBRA SMITH! Come ON Frogman!

- "I'm coming for ya! Threats from a predator.. ppl don't know what he's done.. neither do I but what I do know good ppl don't treat others this way.. I call this the Jekyll/Hyde syndrome.. hear in the kitchen is getting hot! Hey! He's earned it!"

#### Jasperp7070 – Who is this?

- "and Once again Michael Lares is mooching money off his kind hearted followers, donate 35 dollars to sponsor a horse and you get a crappy cheap printout of the horse you sponsor, he really is a piece of work, he'll keep doing this getting as much money as possible until he gets caught but I have to give it to him, he's a convincing, cold hearted thief"

#### Unknown

- "the death of Weiser other horses have lived Weiser could have too if you had got her to the vet days earlier instead of waiting for someone suggesting donations for her to go to the vet!! That's animal abuse when Elise got hit in the head she didn't get help until several ppl suggested she should be seen by a doctor that's a wk give it take after Nicole was taken in... finally Elise was seen! I donated for Elise! YOU DIDN'T CARE ABOUT HER! YOU ARE RESOPNSIBLE!!

#### Loraijazzb

- "I am so disappointed to learn Michael is doing nothing more then a conman, always doing fundraiser after fundraiser, tragedy adter tragedy to line his pockets, ive followed him for amost 2 yrs, he blocked me a couple wks ago, im assuming for following elise, Devyn and kristy... hes a shady as they come... I often wondered where all the money went...horses hurt and dying and him collecting more money...he collected 5000 for xray equipment after hazel died, what happened to that money, hay money ect ect ect... his kid needs a snowmobile for keeping an eye out fir the wild horses, money roused for a fancy machine, all I saw was a kid beat running around the property and entering ocpetitions... hes as evil as they come... I hope his time is coming ot pay the piper".

#### Jantaylor1961 – WHO IS THIS?

- "there are so many others who follow him, probably are donating and being taken advantage of, as he did with myself and others. I've yet to see any of the supplies or receipts that he says the donations are for in the last year. No hay delivery, no X-ray machine, no vet for gelding stallions or the cyst removal on Sunrise. And he claims to be transparent. Thank you for putting gthis in your stories. Maybe by doing so, some eyes will be opened and ppl won't allow him to sue and abuse them. This is only my opinion. Others may think differently about the matter"

#### Oh\_alisse

- "Imagine lying and controlling your family to go along with your narrative and trying to create a cult like commune while pretty much taking people as hostages from other countries because they weren't agreeing to help you launder your charity donations back into your pocket"

- "and def add in the fraud and theft of investments and the huge amount of people he abused for trying to speak out. All the above mentioned, he also cons women to come work for free in the guise of "teaching them" yet its him that was being taught and getting free work and then defaming and slandering the women who spoke out".
- "note he mentions everything LEGAL infact it's quite the opposite isn't it Mikey?"
- "Scamming charity's, manipulating angel investors, abusing women he conned into working for him for free But don't ask him about it. Turns out it IS too intimate".

## 2024-02-13 Notes From meeting with royal

- Meet with client re to whom it may concern
- You haven't had the call to figure out who specifically he wants to target, and things keep coming in every day or every other day
- in what form and what way, need to know who's saying it and understand from the client who he wants to go after,
- look into procedure for taking down posts ask brad has experience with facebook
- some experience form getting material removed from facebook, social media accounts ahead of our call look into online ask Jordan how to remove defamatory material from Instagram write letter, did that
- letter if we have instructions I'll leave you do put in my name with jordan's help by Friday one to Instagram, is there anything else that we need to get or see to figure out who is publishing where and where that author resides
- tell me any where to figure out person new allies how to figure that out,
- I would think there is write to Instagram I don't use any of these social media accounts, I'm on there once a month so if I were using Instagram and someone were defaming

Who authors most concerned about

My take so far, saying what media on what media, and

Devym McMillan

- For sure go after her, name specifically

To whom it may concern

Letter to oh\_alisse

- Can send photo

Letter to Instagram

Letter to Jonathan

- Investigate it later
- For now no

NEED DATES ON THE POSTS

-

## Meeting with Brad

### Q's for brad

- Taking posts off Instagram?
- Is there a way to legally find someone's address from Instagram or location?

### Contact facebook

- Way to do it
- Paul karavata

### Do it on an online form

- Go on form and report it
- I wrote an actual online thing I wrote that I am attorney representative
- Basically said why defamatory I gave a definition of defamation what it is, and what I think I think you lay out where you find it and what the posts are
- 211590
- Wrote a letter to remove facebook pulled them all down
- Said definitely don't do some of the sketchy things to find someone's IP from Instagram no other way really

2024-02-14 Phone call with Michel Lars From Flying Ranch

M = Michel

R = Royal

B = Ben

Letter from Instagram more information about who these people are

- Think about what doing to take this down is getting us weight against confidentiality they have
- Data we need to figure out who they are

Liability on Instagram post this stuff got ball rolling and open to helping good idea as what to do

- Some statute case law
- Worth some research research
- Forget about sepi not following up she doesn't need your help have this file
- This other one here
- Meeting we had they got letter from vendor's lawyer some research wondering if enforceable

Start lookin

R got you in calendar for 3:30 call, I'm going to have to cut my involvement short don't have as much for you, ben will have some things for you, I have some suggestions Instagram open to ball

M = we'll see what they can do

R: one thing to do ben and I going through this yesterday, it is a no brainer that a lot of what we see in the pots is defamatory of you and your company mainly you defamatory, but by implication defamatory of the ranch, but the first issue I want to tackle which you have already started on is finding out to what extent Instagram can help us take all of this down and to what extent they are obligated to help us take it down

M = I don't know

R: we will have to look into that, it is a new area for me and a lot of us lawyers in defamation law, what we can compel them to take down I'm not clear yet, I just know for example ones I have dealt with personally whatsapp or tiktok have client, realtor who had some defamatory videos on tik tok and tik tok banned the accounts, but other tik toks that grabbed the video and dealt with tik tok on another file in terms of taking videos down, Instagram I haven't dealt with them before because tied up in better part of next month and we want to get going on this I will leave it with ben to do legal research figure out what we can compel Instagram, I will dictate letter to Instagram which will piggy backed

M: I was uploading evidence to them as I was talking to guy in phone taking everything down creating file I got file number next level

R: If you sign authorization then Sean should be dealing with us to help you,

M: he told me set it up and I'm waiting to get communication from them I'll continue to upload evidence,

R: send them everything you've sent us, some of this not defamatory, but to extent people are adopting defamatory republication and that is defamatory, I'll dictate a letter to sean asking what we are expecting, I'll put it diplomatically that we trust Instagram will be doing and to extent they can't take it down get information that allows you to sue these eople and to extent they can't give us info to sue these people allow us statements that are defamatory and we can't figure out where these people live and thus where to serve them with legal papers we can't sue them as there has to be a way to take down defamatory material, tik tok they take it down if we get court order we get information they need to trace the defamatory video to the person who created the video

M: as far as the investigative side, can we track where the origin of bogus account

R: it can be costly on top of hiring lawyer I have in the past hired computered forensics guy helping us what data we need to look for what can be obtained from the service provider IP address origin of email whereas posts on Instagram without that technical expertise or Instagram telling me no idea how to track the source where this person is that is easily another 2500 expert. That is option I wouldn't suggest it yet, for now the letter to sean then ask whether you would like to see that more or less what I need to say hopefully by tomorrow or Friday

M: send it to me and I'll send it to them, they haven't given me green light and two told me directly I'm not questioning you they can't deal with external party,

R: that doesn't make sense re legal council, I get that sometimes from certain organizations

M: draft letter to them and I'll send it to email I forwarded

R: it's a very odd email doesn't even look like email from meta support, I don't even know if that is an email, in any event we'll email to him and forward it, authorization form, give me authorization to fine, get us to sign we are advocates, we advocate frankly it is more efficient we deal with say the 3<sup>rd</sup> party the platform they email us we copy you so I'll do that letter for sure, second thing is letter to whom it may concern you can forward that with anybody who is getting the posts or getting emailed something, generic as pressed for time at least gets the ball rolling and outside of that could write letters to specific names like Devin Mcmillian etc. could write to them directly same letter don't know if it will get to them.

M: I can unblock the contact and send mail,

R: okay we can forward them to those individiauls then ideally get reply then at least get email address need to know where these people are ben's identified He's had more tiem to look through these bigger people,

M: I want him as he owes me 60 grand

R: out of jurisdiction

M: he goes around, send that real slanderous audio recording and those PDF's also rallied these girls against me

R: I won't have time to put together a lawsuit one letter to him, devin mcmilliam, deven lamar, and Kristy Mcquade, get demand letter to cease and desist, I'm hoping with these letters and instagram's help all this crap gets taken down

M: they will take this letter claim bullying us

R: then I ask I accept what you to me, is there any truth to what they are saying 100% ironclad defence someone says conman and they are

M: they are hiding behind grey area of some of their accusations some straight up accusations that are lies

R: we need to know if there were mistakes or anything defamatory that is true we need to know that,

M: everything they are saying manner of interpretation, bold face lies

R: if they are lies then it doesn't matter what they want to say claiming you are bullying them, defame someone then on its face proving defamation not hard, proving someone saying something of another person that will hurt your reputation in the minds of a reasonable person if those proven easy to do, need to find location of people, if proven onus on them, prove that any of them are true, some so outlandish and extreme very hard to prove, I have client who emailed MP says criminal says all true now suing now have to prove not easy to prove.

M: I kidnapped threatened to kill someone, police investigated found, animal control no evidence of anything, ongoing a number of things

R: Keep in mind for something that is criminal fact case is dropped on civil standard can't prove it to be true, if the publication isn't wide enough sometimes would say not matter but I sense pretty obvious to me that these publications are so big and extreme cant ignore them

M: right, fired off I don't know her she was just recureited by Devin Mcmillan on larger platform she has 30k platform

R: example of to whom it may concern

R: if possible better comes straight to u

R: leave it to me to put correct contact information

R: do you want to see letters before they go out

R: I would suggest and time crunch you probably want to see them before they go out

M: I want to see them I'll deliver to them and

R: and that's fine too

M: what is the strategy probably exasperate situation they will think some grey area accusations, one girl my assistant she will say I got funding for things and stuff that I didn't'

R: that is of little concern for me think in that sense, they can either prove their allegations or they can't I will make judgement call if they are defamatory if there is grey area I will take position defamatory period. If allies they are not defamatory hire lawyer and prove it

M: she interviewed with RCMP after removing from the ranch made sure safe wouldn't let me check into hotel room she talked to RCMP they told me on the phone found no criminal offence that was back in July last year I guess we got to sequester or ask for police report

R: don't ask for any of that the burden on them, burden is on all of these people to demonstrate A that the statements are not defamatory if they hurt reputation in reasonable person, and if they can't do that then they have to prove that it is true so let them get police file prove the truth, let me know anything that is true tell me know otherwise its on them, then don't worry about grey area if we need to go down that road we will only potentially if your suing people

M: there killer is that they are calling me a kidnapper threatened to kill elise, that trying to silence people who used to be here, getting against entitled privileged celebrity who is trying to shut women up, t

R: again the burden on them proof and bigger allegation threatening to silence people, doesn't mean anything if they can't prove the truth of a defamatory statement not silencing defamatory speech, with this

M: what is this

R: it is cease and desist not very specific not have time more generic, but from what ben and I have I have names for key people addressed to them send directly if email or we send, one letter to whom it may concern and letter to Instagram

M: is this letter I can put name in

R: if get it by tomorrow late in day, may not get it out to early next week

M: that's fine I'm waiting to see what Instagram is doing I wanted to shut their accounts down people getting together

R: there is civil conspiracy, sue for civil conspiracy more than two people getting together with intent rarely used civil claim that is something that goes hand in hand with defamation, injurious falsehood, similar to definition get draft letters, ben will have some questions ben's information will inform final version of the letters, ot you for review, we don't want to be too specific yet, stuck in court keep it generic add names that makes sense, basic defamation law points you are defaming our client stop and if you don't then he will sue you for the maximum possible damages general aggravated and periods in 100s of thousands to whom it may concern, sending represent michel lars, and ranch, numerous falsehoods if you receive posts, contact Instagram to address these immediately

M: requesting that Instagram access messages?

R: what we want them to tell us what they are doing as soon as possible posts or accounts

M: I want accounts

R: we want posts removed key thing is accounts themselves it is the posts themselves, remove accounts and if not information we need to sue them, paraphrasing a bit, what I am recommending get ball rolling if not help from Instagram then ben will have time if they don't stop forward what we can do vis a vis Instagram no way to sue anyone

M: I have physical addresses

R: get those to us if they don't stop then that is where they are, if Devin Mcmillian lives at X address has cease and desist letter if big enough concern then we put together notice of civil claim get process server once filed we hand that to agent tracs person down and that is a hammer she has to do something otherwise she has a big problem

M: what kind of power does a cease and desist

R: most of the time that gets people to shut up: I have one file where I had to start lawsuit the other day as some idiots with money to lose if nothing to lose hard to get them to shut up if income and working they have something to lose and a cease and desist usually something to lose, gernally damages you can recover if short term, limited damages are less than legal cost

M: I know you have to go Jonathan but father Gilmore who is joint account Gilmore has assets

:R doesn't matter unless he has, unless spoint ot him that he is author, other than extent he doesn't want the hassle anyone who has income or assets are people have to be worried take cease and desist seriously bothers business, other alternative say what you want

M: I've done that for years, they are trying to garnish more support broader net

R; that is broader sense I got,

M: trying to paint me as this aggressive bad person I have a lot of high profie

R: I have ot go and ben will phone back why would any of them do this what do they have to gain

M: they were trying to forge something here at ranch no future didn't work out I remeoved them from campaign when other girl supposed to be assistant, move hear realized she couldn't, Devin mcmillian I helped her get non profit said I owed public apologies block them on Instagram really pissed them off got collevtively together, none worked ou

R: ideally have some income assests and they live in BC, I should add if somebody posting something in Africa or outside of Canada, three way strategy to whom it may concern have to rely on Instagram to take them down

M: Kristy Mcquard, Devin Mcmillian Canada, Devin Lamar in Michigan conspiracy all working together

R: can serve them out of province, fore defamation, has to happen in BC,

M: conspiracy term I want to use,

#### 2/14/2024 Questions for client?

- Overall need to know when these comments/posts were made

Devyn McMillan

- 
- We have date of the big defamatory livestream

Kristy McQuade

Devyn Lamar

- Black background, grey messages from Deven M Lamar saying found the right person to help coordinate, I found and called Jonathan skeels..... who was this message sent to? Was it Dawn Olivieri? – when was this sent?
- White background message where Deven says “I will see him pay for what he has done to all those great supporters, his kids, the 3 horses he killed, and all the rest he has done. Money laundering tax evasion fraud.... – who was this said to and when?

Andrea Prescott

- A post where it appeared she stated “this is the post of a 60 year old man who arbitrarily blocks older women” – was this andrea prescott who posted this, if so what was the date?

Jonathan Skeels

- Has Jonathan filed an actual legal lawsuit against you
- Have you spoken with his “lawyer”? what is the current status of this alleged legal action? Do you have a separate lawyer for this?
- Can you provide us with all copies of all legal documents that have been shared around
- Can you provide me with the rest of the conversation which Jonathan had with Junior – looks like email took place on or about November 4<sup>th</sup>
- Who is Chantelle Edwards? When was this communication with her?
- Who else has received these “legal documents” when did they receive them?
- Need full copy of all legal documents
- Picture of your communications w. dylan where “Oh and don’t forget to mention that oil leak to Goel?”
- What is this communication with Branlin regarding David Ricci – Amazon Web Services?
- Is there any other communications you have where Jonathan himself has said negative things about you or the ranch publicly or in direct messages to people.

Abbe\_dae

- Who is this

Jasperp Lorajazzb or Jantaylor1961

- Who is this

Oh\_alisse

- Appears to have been from yesterday 2/14/2024 CONFIRM WITH CLIENT

Phone call with Michel Lars 2/14/2024

#### Question for Royal

- I need to get an answer I want to make a public statement on my platform about this, Is it okay from my legal council interview style defending myself against
- M I got hundreds of people reporting in with this stuff, I deal with some famous people down in the states in show business they say addressing some say don't engage just let it go, as spreading this campaign of hate, appealing to people saying abusing Women I have female actress doing shoots, interview style sit down on a live with thousands of people will review it, just doing down the laundry list, filming them given a lot of people peace of mind that follow account, sees slander defamation go to my page, have opportunity to see engaging accusations if we can do or not or what he would suggest
- With that in mind can I post the cease and desist letter as an information base? Only problem I have that is 157k followers that is a lot thousands of people use our page, people on deathbed, in hospice taking care of families watch our page got messages last thing their father or mother was talking about horses and died there is a real that is why I block page, most of my page keeping page high and clean most defamatory page is misrepresenting I have never said non-profit, we funnel these funds in the form of gifts into project space we raise for funds raising shelters buying handling systems and vet care, but we don't have to write receipts that people are getting a non profit, your transaction receipt, there is laundering money scamming people just
- Probably trying to initiate a non-profit to properly get funding in as lots of people can't get donate, write off as a gift as tax deductible proceeds pretty famous people that want to funds hundreds of thousands to build facilities here and vet things all these girls and Jonathan all people we were trying out got excommunicated from here no smoking gun nonspecific value no abuse my family happy being here, lots of female wranglers who come here, business partners in film industry these girls basically got kicked out from our network just bent here
- Devin Mcmillan
- Devyn lamar here, in Michigan I don't know here, she was follower here and then she started hustling me acting like wanted to buy horse kicking tires just harassing me I blocked her I infuriated her,
- Elise reculard asked her to be removed I asked her to remove her to opportunities with ranch, she didn't call either but none of that had any emphasis not a big deal, until Kristy Mcquade left here, biggest advocate against both while still here,
- Kristy Mcquade conversation I had with her before she left here crying on the phone that this was not opportunity for her, couldn't have 9 year old not thrive and MS and can't pick up saddles can't be wrangler here, no skill set to be production manager, all she could do was social media stuff became obsolete here, when finally left before she left, she got so pissed while here she left before we got back and turned on us, reason why don't have them in network don't want in operations banned against here, Devin McMillan had some kind of crush she took it personal
- Trying to band together civil conspiracy only vehicle they have violating community guidelines hopefully Instagram will step up here I am presuming

#### Ask about dates?

- Dropbox scrables everything
- I deleted off my phone can't keep carrying all of that, and I have about 950 gigs have to dump stuff all of this is from October November December January,
- All from last two quarters
- What happened was Jonathan, that buisness deal didn't work out
- He got angry then tried to hold me hostage brought no sponsors no money committed with whole trip camera crew equipment and he didn't bring one damn sponor he got all big I'll go ahead and buy the trailer and he didn't have money I told him going in I don't spend my money you don't spend yours I couldn't keep point, he kept going all over the place, I had to pay for all the deliverabels then he threatened me, to come here, wire didn't go through twice on the trailer, sent the cheque via snail mail tell your person not to spend extra so she didn't never send cheque snail mail, and we still haven't seen cheque
- Stuck in some warehouse, it revealed who this guy was, no way step into any kind of partnershiop I basically halfway through my trip stopped talking to him camera crew had to pay them 14k 4,300 on website, ultimately holding hostage on extra money finally sent him extra money asking for an additional 50k his time and paid back I haven't seen any more paperwok

#### Jonathan Skeels

- No actual legal claims no working knowledge he has
- He sent something from London law firm, that one and then
- Asked to send weird legal document, he's looking for it, I had system crash thought I had forwarded it on, it showed attachment there,
- Never spoken to any of his "lawyees" feel free
- I'll see if junior has it, he was going off on me, stop not government buisness, Junior good friend of mine, these guys won't give him time of day they blow him off, send me copies of this stuff, I need the evidence, I'll see what I can find not coming up with the raw document
- Should I reach out to Jonathan or his lawyers? Him sending me these threatening emails and trying to scare me?

#### Who is chantelle Edwards

- Gal that he trying to be a bigshot, he wanted to land aeroplanes here baited this girl in went on one date, on dating app in Vancouver she thought he was weird got her, said drop in ranch for 2<sup>nd</sup> date, sent her video and she couldn't turn it on, she is personal assistant, for some bigshot guy, the Ceo Brian hill of aritzia, Brian hill is her boss, her personal assistant, so and that is how this guy knows people, they all think he's crazy don't know him that well this guy bullshits, she flew into here, got off the plane, how do you know Jonathan, I don't know him that well chatting on Instagram first time met him trying to network up here, had nice visit, she dumped him the next day as too weird but she and I stayed in touch, she really fears him, he's been stalking her and brian hill after flight her though she had in here
- Guy can't take rejection makes him crazy in short period of time, I was counselling him to quit being so weird and turned on me, just in background check,

- Messages to chantelle date: she deleted them off the chat looks like she did so he doesn't know she's pretty smart I can't go back past November 5
- Branlin film producer, he was working on the project with me, with dawn olivieri, Jonathan was supposed to get sponsors and network he was supposed to fund that end of the project I was keeping him away from keeping Branlin as Jonathan wasn't working out he went around my back said I'm involved with this production want to deal directly with me, I'm the one in charge, make decisions Branlin said no thanks dealing with Michel it pissed Jonathan, I have no credible evidence, he created bogus account mid October and put him on dating site, with bogus account trying to get him in trouble with his wife, trying to get him tripped up on social media so branlin came to me this Jonathan, basically two or three days Jonathan, open case with linkedin created bogus linked in account cyber sleuth opened certain account, branlin down olivieri up here in beginning of march he has open file with linked in linkedin to dating site
- Same site kristy sent screenshots of Jonathan being this creepy guy girls put APB on him that's what those screenshots are

#### Any other videos or pics of Jonathan

- Biggest push heard audio call will send that to right now 30 minute
- Ion audio emailed it also a file I forwarded with a PDF as evidence
- He based all his slanderous statements looked like 9 pages of screenshots of discussions with devin lamar
- That audio recording so nasty to the actual RCMP officer, recorded it got in the middle of it, never cut that out of the final cut he was getting drunk told RCMP that he was going to go have a drink

#### Devyn Lamar

##### Correspondence between Devyn and who in the black background screenshots starting at 7:06PM?

- It was with Dawn screenshotted that to me, warn her about me reached out the dark background with grey and white writing starting at 7:06 on December 17<sup>th</sup>
- White background she also sent that to dawn, that was leading into that exchange CL thinks it was part of the same exchange, he says he doesn't know different parts of the platform, she's talking to dawn I can't tell if its on the same day
- Asked CL for as much specificity as possible
- He says got most evidence sent to me, Most people do it for me, I pay a few people to do it for me, they send some screenshots, and screen recordings, and I'm flipping through then now, find a timeline for us.
- Dawn heavy in my corner wants mike drop on that while up on the ranch here

#### Abbe\_Dae who is she

- Follower that I blocked

#### Previous followers that I blocked who were hating

-

## 2/15/2024 Notes from Jonathan Skeels call with Constable Tobins

- "sexual abuse and threats of violence that I believe would elevate the situation"
- "I have documented it all in an exchange with what is effectively a whistleblower from out east who is intimately familiar with three separate individuals who worked at his property in the last 6 months"
- "he recruits women brings them to the ranch and does his thing"
- ... Elise He threatened her after a rodeo the short of it is he brings her out here shes 23 he tries to force her on his son in a sexual relationship when the son and her become friends but decide better to not be in a sexual relationship because she is 23 and he is underage he cuts her off at a rodeo locks her up in his truck drives her through the middle of the night threatens to kill her drops her off in the middle of nowhere.... ..... the whole time it was going on When he's making these death threats threatening to leave her in the middle of nowhere to be eaten by bears and he can do it as no one will know....
- "she was listening to it but not recording it"
- That other girl drove through the night to collect her and rescue her, afraid for her life that michel would come back and kill her
- Three women third one is kristy mcquade, living there with his daughter discovered their frauds and called them out on it, she filed a claim all filing claims separately don't get to any action
- The French woman is so scared for her life, ran back to France cant handle any conversation about it, I've documented it all in a conversation and put it in PDF nicely
- The Austrian couple that were there working for free and were abused by them, who were restrained from the internet have left
- The elise got run out of down scared for her life
- Devyn Destinee from Kelowna who went to help with the horses and ws asked to launder money through her charity left was cut off
- Everyone that has been involved in this propey has left because of sexually harassed
- "stole 45,000 for me"
- He is a serial abuser and recruiter of young woman to his property gets them to the end of the road the woman who alerted me to this she is aware of his con in north cariolina

5:00

- My very serious concern... is that he is now on his property he is being demonstrating activity locking up all the gates he has an abused wife there that he makes monitor social media delete and block any person up against him and she is obviously abused she is not allowed to contact her family back home a bunch of this is hearsay but a bunch of this is firsthand accounts
- The daughter is also controlled, the son also hates his father but is controlled
- He's got a lot of fucking guns is acting very neurotic,
- "there is documented proof of him tying down horses that he has raised money for to have gelded and he's doing it with no anethetic the old cowboy way and is just cutting off their nuts which one is geli.. I don't even know or care... pictures and videos of him doing that"
- "its really fucking shocking"

- "he falsely imprisoned a girl threatened her life scared the shit out of her dropped her at a hotel in clinton"
- The girl devon was listening to it on a dead phone the whole entire time
- That woman has come through her own... sorry I get emotional because my mother was abused...
- My deepest deepest fear is that michel is getting called out for this he spends 17 hours a day blocking comments on social media he is getting winds that Jonathan Skeels who he thought he could con and take advantage has got all these girls together... and who knows what is is doing... im not saying its ruby rage but I'm not saying its not hes not there are two
- Still two women and one son on that property with effectively a psycho... he's a prick... hes also an abuser...

10:00

- I have 10 page PDF with all the contact details
- "He started groomer her and started asking for cute pictures of her and her long hair"
- "michel still owes me a shit ton of money that he is refusing to pay"
- There is alterior motives of course but I stand to lose 25k dollars

15:00

- By the way there is a whole financial fraud as michel claims to be a non profit then he brings in all this money tries to run it through non profits to wash it, there is all of that to follow up, any money he has paid me has been through venmo and paypal in someone else's name
- "oh that's weird" – officer
- Some suggestion that it is his sister and his mother and has an estranged relationship with them and his wife's family he stopped his wife from talking to her family I believe the girls this collective of abused women that I've managed to talk to and encourage, I have a different skill set this happens in abuse situations they are so ashamed and traumatized by it...
- They don't present it in a way that is actionable its just hearsay when its devon on the other side listening ... again rants about eaten by the bears
- Nothing actionable from what elise told us – officer
- "she's not telling you the fill story" – Jonathan
- "Devin destinee also sexually harassed by michel"
- All these women are getting abused by michel and he is grooming more he spends 17 hours a day on his phone chatting up women he invites them to his ranch and sees what he can pull
- If its bill cosby there are 40 other women he's been doing with it for 40 years

20:00

- Claimed verbally abused videographer, at breezeway and refused to give back harddrife, then at that videographer was denied entry as he was deemed to be taking job from an American kicked him out of the truck took all of his stuff, and left him in Osoyoos by the side of the road

- There has to be something that you can pursue on Michel that sticks whether it be tax fraud, whether it be illegal guns because I know he has a shit ton of illegal guns on his property, I mean Al Capone went down for taxes right?

25:00

- He's been grooming Devin for four years chats to her for three years before saying hey your cute send me pictures of your long hair, its classic grooming

30:00

- In the signature to that email is four different phone numbers the best is use whatsapp or apple Imessage is to add my numbers to connect with 760 or connect with Imessage on the other ones, can email him,
- He claims to be a horse rescue and he abuses horses
- There is a contingent of them that have reported to the SPCA who has provided incident re gelding,... SPCA took the claim and can't go out there
- He brought this on himself he created a public persona that is a complete lie, he has taken donations fraudulently to do certain things and he's an abuser of women,
- Perfect situation is that he abused Devin and her friend Michaela, Michaela has a couple of his horses that he is supposed to pick up soon that would be the perfect time to arrest him as he wouldn't be with his ranch
- Michaela is a friend of Devin's who runs a horse training clinic near Devin, I didn't provide her information as I haven't connected with her and I'm not familiar with her, but Devin will have all the information and Michel took a grant proposal say raise a million bucks for them and have his rider on it, another scam that he does, he raised money from his supporters in support to bring hay to her, and then he never gave her any money or hay.

35:00

- The woman that knows all about it as social media manager Kristy McQuade who was asked by Michel to get rid of all the complains, and she's like wait a minute I'm not doing that....
- "I alerted Junior Lulula, months ago about Michel, just alerted him the other day about the fact that Michel is an abuser, he said "stop contacting me"
- Percy Guchon will do something about it

2/16/2024 Phone call with Michel Lares notes

Royal's suggestion

- Balance trying to get done and adding a bit more detail he is leaning towards getting these done added detail not make any difference that is his recommendation to him, with that advice can send him individual letters to name people in word and he make revisions when clients start doing that start adding things that aren't legally relevant or helpful but if he wants to make revisions in a letter that he can actually sign by early afternoon he can look at them and get them out by the end of the day.
- Do not change one to Instagram and to whom it may concern
- Individual one has advice not worth it

Notes from phone call

- What happen is all parties compare letters and they are also going after wife and family, made defamatory statements about family included in there, they think they are right
- If the letter just includes you and the ranch won't shut some of them up when add family said things about family I think that has a lot more empowerment to the document
- Wants to see family in there, and I'm not questioning any of the legal options here, I'm also learning
- I want them to understand that I am filing a civil conspiracy case, and they are part of it and if they continue could language that,
- I'm trying to wait back from Instagram
- At least two of them put them on blast he's a bully

Letter to Instagram and to whom it may concern

Just trying to letter and perspective of family

- Claims against ranch him and his family to him it is more malicious by dragging family into it, my son massive part of dysfunction of elise

Reputations of Lars Flying L ranch and his family

Kristy Mcquade I had different relationship

- Elise Reculard work away
- Went on large ramble about history of each person
- Her cease and desist, can't be framed like the others, hers is framed around accusing her about this being entitled white supremacist and abusing my platform and she's making me out to number 1 groups that helped abduct, saying I'm malicious character
- Kristie accounting and operation is there a mention that can be put in there that addresses that, as different from devin infinite information
- She's hinging saying has all effort, saw money come in has no information
- She's given Devin Mcmillan spreadsheets, going to end up in suit

- Wants to wait back from Instagram want to arm it up
- I don't want to send them out to Instagram no action point this for a month because he is on another case, I want to fully exercise, as this is very very powerful I have to key it in with what Instagram comes back in with If I can legally add something with these letters
- Next Tuesday or Wednesday need to understand what is going on
- Waiting on baited breath leaning heavily on fact say pull some posts but not shutting accounts down, but if they are already noticed on filter to notice on accounts not doing much not sure if Instagram muted them or what
- Too early to implement this strategy without hearing back from Instagram I love and appreciate effort want to hear back from IG about what

Got to have the family on it in my opinion

- I want to know got response from meta

Wants one to go out to andrea prescott

Devyn Lamar

- Called RCMP and animal control
- Emailed chief
- Called BCSPCA and filed case her reach was different in that way
- Messaged vet and asked paying bills
- Those individual relationships have an approach at me

Want language them to have fear of god in them to know what they have done has activated a suit

- He might say already done that
- I'm just expressing what I like to see in this letter
- Counter intuitive in that paragraph should you continue to do so instruct
- Want them to think legal proceedings have already started
- Threat of continuing to have legal proceedings

3:30 -4:00

Michel is happy to meet at that time

2024-02-16

Phone call w. Michel Lars and Royal

R: I'm pressed for time,

M; thank you for the meeting

R: I want to try to ease your mind a bit before I'm largely incognito for a month doesn't mean no one on file, both assistants on file and I will be occasionally in touch but everything will be delayed take days instead of hours, or maybe longer

R: Only benefitst the lawyers but clietns never enjoy it, none of it, not any fun, so now A number of things to address here that will ease your concerns, so first of all the individual letter to Kristy Mcquade Jonathan skeels we tweaked the Jonathan skeels I take your point about the second paragraph in each of those letters the intention is for these letters to say you are going to be sued, but the second paragraph

R: letters to individual people all the same except for the one to Jonathan, the second paragraph where it reads should you continue to do so I think to the ordinary reader looking at this it could be construed as somewhat ambiguous should you continue to do so that will only increase damages claim, the rest of it I should suggest should stay the same going beyond that any further details for some statement that Kristy Mcquade made that Jonathan made that she didn't wont add to the force or point of letter will only take much more time won't get you any further ahead but that change to paragraph 2 will make it easier for them to understand, intention was to say going to be sued if you stop decreases the damages, having said that I don't recommend you make final decision to sue anyone A as big decision costly more of your time and money to sue and B part of the intention of this letter is give them a reason to stop if they don't stop then you can make decision and this letter important evidence in that case, but if they do stop then you can still sue them and recover damages as what they have already done if this individual person and not someone by same name was the author of these defamatory publications issue subject to any defences is the key one is truth if they can prove anything that is defence, someone like Jonathan Skeels might not be worth suing decision make final call on later for now these letters even if they are showing them to each other, all dictated in my head in what applies in my head in this case

M: I meant no insult

R: you do have certain parts of profession that do copy paste but this it just happens that the elements of the tort of defamation are the same certain things common in letters

M: my inquiry Kristy was employee infinite knowledge on business side didn't know some kind of breach working for previous employee does anything say not supposed to take things to defame her,

R: that is very different legal issue that I don't recommend we don't get too much into now, as former employee confidential information that she shouldn't disclose as a matter of confidence law, legal claim breach of confidence, in small low level employee even if applies doesn't apply defamation claim is very specific, if defamaing here can still be sued for that

M: she's using income for donations for horses and projects saying not allocated, she never saw outflows, she's saying what these girls running with saying fraud not using for certain things only working knowledge of money flowing on basing a lot of defamation are her copies or screenshots of paypal income some big donations in so she's breaching some level of something, want her to understand one thing I am concerned about is that a breach

R: you may have a claim there for breach of confidence information about internal workings of company what you do with Flying ranch here, does with donations or other forms of income is an internal matter that is no one else's business

M: that is what she's disclosing a way to use that term in her letter

R: without, keep in mind I have to sign these say something I can back up I mean it when I say it, I can add to her letter the following "as a former employee of Mr. Lares's company you in particular received confidential company information in circumstances that required you to maintain the confidentiality of that information in addition to defaming our clients it appears that you have also breached your legal duties to flying L ranch as your formal employer by publicly disclosing that confidential information. That is a serious breach of our clients rights to maintain the integrity of its internal private information"

M: as long as she understands violating the law and she's being brought aware of it, by shock and awe campaign

R: I can say something like that to that effect

M: she's taunting around that I should be scared

R: with Jonathan skeels tweaked that a little bit, keep what is there changes to paragraph 2 and then if they want to post these oh being oppressed or threatened, that doesn't matter but it doesn't matter it only to some degree makes the point that they are being malicious and have an axe to grind whether you actually sue them is another matter particularly if change behaviour again with the view that you actually care about what these people have to say, saying defamatory things about someone if insignificant nobody change but these do sound serious enough probably worth suing, it is a partial bluff, I would probably say if Instagram takes everything down I would urge you not to sue but on assumption lawsuit can get to gives them a reason to stop and get legal advice fear in any rational lawsuit set up basis for lawsuit and evidence in that lawsuit I will get those out to you

R: the to whom it may concern don't recommend any changes and you can send that to whomever you please to have something to respond with

R: the Instagram letter, whether they are getting back to you or not don't make changes this one allow us to get it out I don't expect not much they will do to the extent they have policies and procedures cancel account purpose is to put them on notice thanks for helping us these guys have to go another level higher to get your managers or senior people involves this is serious need to do more and extent they can't potentially go after Instagram dealing with them. And some social media not much case law out there, fairly new area

M: we are creating policy with this now

R: law evolves in new situations, every case is different take general legal principles all of it judge made law no statute, libel and slander act, but primarily dealing with papers and things like that, I take your point paragraph 2 make that clearer and adding that wording about Kristy Mcquade,

R: ben will look at Instagram point, may be precedent or legal principles in defamation law we can argue in legal principles if it turns out that Instagram is not doing enough, legally whatever federal statutes or regulations Canadian radio social media policy all relatively new, at the end of the day if Instagram is not going to take down posts that are clearly defamatory merely because maybe true there has to be remedy in law, against Instagram I would likely not recommend you sue Instagram a lot of money and time to pay guys like me that will try to make things costly and difficult

R: if I have client time and money really go after someone that makes for costly litigation if client can afford it and wants to do it, and there is good reason for it we can pursue it, and the party on the other side spending a lot of money very costly have to accept that, these folks not a lot of time and money and want to go posting that's fine, one girl Devin Mcmillan trying to make herself a hero,

M: probably cost me a lot I'm not going to back down that is

R: easy to say but people unsophisticated very quick to say well I'm going to do this, but once faced with lawsuit income assets or anything this stress and strain and people start changing tune a lot, We'll find out

R: any way to get physical or geographical locations or addresses

M: I can get you hard addresses

R: if nothing changes then over the next few weeks may be able to get draft NOCC how to start Supreme court lawsuit nothing finalized week of mark of 18<sup>th</sup> week I can finalize depends on what the associate lawyer has to do in court it may be able to get it started Ben's not that experienced with pleadings might be able to get draft her

R: nobody's going to ask for lawsuit, I have seen people say go ahead sue me nobody wants to do that nobody realizes how much makes their life miserable until why the heck even Donald trump wants to deal with lawsuits

R: that is way it goes, let me make these changes get those out to you, leave it for now, until get those out to you, have ok send this to Instagram, at least your position is put out there,

M: lets let it rip I'll look at them real quick

R: if assistant can stick around let me get these to you

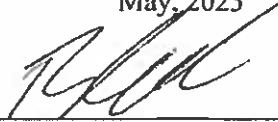
R: with that one tweak this is more than good enough

2/16/2024

Some of the points Michael made with regard to the letters

- He is concerned with all the parties getting together and comparing their letters, he was worried that they might come across as not strong or intimidating enough
- Wants us to mention that they were also defaming his family in all the letters.
- He wants the individual them to scare them and make them think that they are in a suit, it sounded like he wanted to sue them no matter what but I was not clear on that. I think he believes that they will not stop just through cease and desist letters.
- He thought the first two paragraphs were contradictory for the individual letters in that it made it seem as the first paragraph made it seem as though we are going to be suing them but he interpreted the second paragraph as though it was saying that we wouldn't initiate legal proceedings unless they continued to defame him.
- Wanted to wait until Instagram responds so he can "arm up" the letters.
- Wanted more details about how each individual has defamed him in the individual letters.
- Also he was not sure what was going to happen wen you were in court for 4 weeks, didn't seem to like the idea that little was going to happen
- Wanted individual cease and desist letters for andrea prescott and Alisse Andrews.

This is Exhibit "G" referred to in the  
Affidavit #1 of Benjamin Morley  
sworn before me on this 16<sup>th</sup> day of  
May, 2025



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A Commissioner for taking Affidavits  
For the Province of British Columbia

19 February 2025

**FILE NO.:** 10650-001

**VIA E-MAIL:** [rmorton@mcquarrie.com](mailto:rmorton@mcquarrie.com)

McQuarrie Hunter LLP  
Suite 1500, 13450 102 Avenue  
Surrey, BC V3T 5X3

**Attention: Royal Morton**

Dear Mr. Morton:

**RE: *Lares, Michael v. van der Heyden, et al.***  
**SCBC Vancouver Action No. S248901**

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Please find enclosed for service upon you our response to petition and affidavits of Mr. van der Heyden and Gurpreet Uppal.

We have also enclosed for service upon you a notice of civil claim filed 15 May 2024. Mr. van der Heyden had hoped the parties could resolve all disputes between them amicably before the service deadline arose. Please confirm you accept service on behalf of Mr. Lares.

As advised in my prior letter, we are currently considering the conflict of interest issue and the potential need for the company to obtain independent legal advice. The undersigned is now out of the office until 03 March 2025 and then in discoveries in a complex mass tort matter throughout that week. We anticipate

confirming our instructions on those issues in mid-March.

Yours truly,

EYFORD PARTNERS LLP

Per: 

Drummond Lambert

DL/me  
Encls.

No. S248901  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

MICHAEL LARES

PLAINTIFF

AND:

PETER VAN DER HEYDEN and FLYING "L" RANCH  
LTD.

DEFENDANTS

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**AFFIDAVIT**

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**FASKEN MARTINEAU DuMOULIN LLP**  
Barristers and Solicitors  
550 Burrard Street, Suite 2900  
Vancouver, BC, V6C 0A3  
+1 604 631 3131

Counsel: Corry Clark  
E-mail: cclark@fasken.com  
Matter No: 247744.00008