



FORM 1 (RULE 3-1 (1))

NO. *Court File No.* **NEW-S-S-257137**
NEW WESTMINSTER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

MICHAEL LARES

PLAINTIFF

AND:

DEVYN MCMILLAN, JONATHAN SKEELS, KRISTY MCQUADE, DEVEN LAMAR, ELISE RECLARD, ANDREA PRESCOTT, ALISSE ANDREWS, JANE DOE and JOHN DOE

DEFENDANTS

NOTICE OF CIVIL CLAIM

This action has been started by the plaintiff for the relief set out in Part 2 below.

If you intend to respond to this action, you or your lawyer must

- (a) file a response to civil claim in Form 2 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim on the plaintiff.

If you intend to make a counterclaim, you or your lawyer must

- (a) file a response to civil claim in Form 2 and a counterclaim in Form 3 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim and counterclaim on the plaintiff and on any new parties named in the counterclaim.

JUDGMENT MAY BE PRONOUNCED AGAINST YOU IF YOU FAIL to file the response to civil claim within the time for response to civil claim described below.

Time for response to civil claim

A response to civil claim must be filed and served on the plaintiff,

- (a) if you reside anywhere in Canada, within 21 days after the date on which a copy of the filed notice of civil claim was served on you,
- (b) if you reside in the United States of America, within 35 days after the date on which a copy of the filed notice of civil claim was served on you,

- (c) if you reside elsewhere, within 49 days after the date on which a copy of the filed notice of civil claim was served on you, or
- (d) if the time for response to civil claim has been set by order of the court, within that time.

Form 11 (Rule 4-5(2))

**ENDORSEMENT ON ORIGINATING PLEADING OR PETITION
FOR SERVICE OUTSIDE BRITISH COLUMBIA**

The plaintiff, Michael Lares, claims the right to serve this pleading on the defendants, Deven Lamar, Elise Reculard, Andrea Prescott, and Alisse Andrews, outside British Columbia on the ground that it concerns a tort committed in British Columbia, and is a claim for an injunction ordering a party to do or refrain from doing anything in British Columbia, pursuant to section 10(g) and (i) of the *Court Jurisdictions and Proceedings Transfer Act*, SBC 2003 c. 28, on which the plaintiff relies.

CLAIM OF THE PLAINTIFF

Part 1: STATEMENT OF FACTS

1. The plaintiff, Michael Lares ("**Lares**"), is a rancher and has an address for service in this action at suite 1500, 13450-102nd Street, Surrey, B.C. Lares has been operating a horse ranch either personally or through a company from about July 2011 to date on about 240 acres of land located in the Nemiah Valley, British Columbia (the "**Ranch**").
2. The defendant, Devyn McMillan ("**McMillan**"), is a former mentee of Lares and resides at a home at or near McMillan Drive, Vernon, B.C.
3. The defendant, Jonathan Skeels ("**Skeels**"), was a potential business partner of Lares and the Flying "L" Ranch Ltd. (the "**Company**") and has a last known address at 32557 Murray Avenue, Abbotsford, B.C.
4. The defendant, Kristy McQuade ("**McQuade**"), is a former contractor of the Company and has a last known address at 626 Sutton Place, Delta, B.C.
5. The defendant, Deven Lamar ("**Lamar**"), is a former social media follower of the Ranch and resides at 12738 S. Locust Ave, Sand Lake, Michigan, U.S.A.
6. The defendant, Elise Reculard ("**Reculard**"), is a former work away of the Company and has a last known address at Le Chêne Bidault, 72150 Saint-Pierre-du-Lorouër, France.

7. The defendant, Andrea Prescott (“**Prescott**”), is a former social media follower of the Company whose address in B.C. is unknown.

8. The defendant, Alisse Andrews (“**Andrews**”), is a former social media follower of the Company whose address in B.C. is unknown.

9. The defendants, John Doe and Jane Doe, are each as yet unknown individuals who have acted in concert with one or more of the named defendants with the intention to cause damages to the plaintiff, or alternatively whose actions in concert have had the affect of causing damages to the plaintiff, through one or more of the defamatory publications outlined below and other acts as yet unknown, particulars of which and whose identities will be provided when available.

Background

10. In about 2023, the plaintiff had business dealings with Skeels which resulted in disagreements between them.

11. On or about December 6, 2023, Skeels published an email to approximately 15 individuals, including Tom Pedriks, Tyler Michael Hazelwood, “Tyler”, Max Reilly, Gilmore Skeels, Lou Meggiato, Rob Leigh, Todd Angman, Mercedes De La Cruz, Jaida Hay, Karen Kim, Christopher James Brent, Jodi Mosogau, Alex Vespestad, and Liam Luxon, which included the following false and defamatory statements of and concerning the plaintiff:

- (a) he “*was a conman [who] attempted to steal a lot of money from [Skeels]*”;
- (b) he is a “*misogynist narcissist*”;
- (c) he is engaged in “*fraudulent fundraising for his supposed horse rescue and what not*”; and
- (d) he is a “*serial abuser of women*”,

(the “**Defamatory Email**”).

12. These statements in the Defamatory Email were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) he is a conman;

- (b) he is a criminal or fraudster; and
- (c) he is a serial abuser and victimizer of women.

13. On or about December 20, 2023, Lamar sent the following false and defamatory Instagram messages to Dawn Olivieri, of and concerning the plaintiff:

- (a) he killed “*three horses*”;
- (b) he has engaged in “*money laundering[,] tax evasion [and] fraud*”; and
- (c) he has engaged in “*sexual abuse*” and “*threatening to kill or do bodily harm*”,
(the “**Lamar Defamatory Statements**”).

14. Lamar has republished the Lamar Defamatory Statements to one or more third parties in British Columbia, particulars of which are currently unknown to the plaintiff.

15. The Lamar Defamatory Statements were defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) he killed three horses due to his incompetence as a rancher;
- (b) he is a fraudster who has committed money laundering, tax evasion and fraud; and
- (c) he is a violent criminal who has sexually abused women, and has threatened to kill them or cause them bodily harm.

16. On or about December 21, 2023, McQuade published a false and defamatory Instagram comment of and concerning the plaintiff stating “*dirty is using animals to pull peoples heart strings to line [his] pockets*” (the “**Defamatory Instagram Post**”).

17. The Defamatory Instagram Post was false and defamatory of and concerning the plaintiff in its literal and ordinary meaning, or alternatively, it conveys, as its natural and ordinary inferential meaning concerning the plaintiff to the average reader that he uses animals to trick people into giving him money.

18. On or about December 23, 2023, McMillan published an approximately 1 hour and 7 minute long false and defamatory Instagram livestream video, which included the following false and defamatory statements of and concerning the plaintiff:

- (a) *“why are you choosing to talk now? Because I had to wait until his true victims, like I’m not labelling myself as a victim. I’m definitely labelling myself as someone who definitely got bamboozled and almost committed fraud with [him] because of lack of understanding and lack of business sense which now I’m going to use that as a PSA with internet people with bright shiny prospects and promises, please don’t put all your eggs in one basket like I did. Don’t ride on and bank on this person delivering on what they are saying they would do. Do your homework and do it yourself now it has backtracked me months and months to correct this crap”* at approximately 4:03;
- (b) *“he sure got a kick out of [McMillan] crying [her] eyes out every day and he sure got a kick out of [McMillan] feeling awful about [her]self because [McMillan] couldn’t live up to his standards. [He] just likes to make people feel awful. And you know what [McMillan] heard from a reliable source that he tells the kids in his family that they would be nothing without them, that they couldn’t survive without him.... Do you know what that is? That is control”* at approximately 6:17;
- (c) *“he does not 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 their, in the pocket or unless he sees something in you that he could value and use or advertise or make him look good, he’ll toss you out like a dirty shoe”* at approximately 10:08;
- (d) *“he neglects all those horses. When we went up there the first time and I saw all like the big wormy bellies and the skin and bones and stuff I was very much like what is going on”* at approximately 17:11;
- (e) *“he knows very little about horses.... He doesn’t know anything about horses”* at approximately 19:01;
- (f) his *“feelings got very hurt and that all reflected back on [Reculard] somehow, no idea, so just machoistic ego, typical stuff, typical like can’t take a joke can’t take a dig or anything, has to throw a temper tantrum and kick a woman out of the country*

for it, apparently. Um, yeah you know, no sensitivity there whatsoever. So anyhow, they're all out. [Reculard] gets asked to go dance with somebody. She goes out for one little two-step, goes right back to the table. Michael's gone for some reason, stormed off, super upset, super frustrated, blah blah blah, 'how dare she go dance with somebody. I'm supposed to keep her cooped up on my ranch forever. She's my prisoner' kind of like beauty and the beast shit right like Stockholm things. He likes to do that to people" at approximately 20:41;

- (g) "[he] comes unglued on [Reculard]. [He] comes unglued to the point where she is so frozen she can't reach for her phone cause you know what happens when a woman is trapped in a vehicle with a man raging at her driving" at approximately 22:12;
- (h) he "verbally assaulted [Reculard] for three hours, having her life threatened, having him say that there's nobody that would care. She is from another country. If she went missing in the woods, nobody would be able to find her, she'd get dragged away by a bear" at approximately 22:55;
- (i) "[Reculard] thought he was going to murder her I mean rightfully so you're up in the middle of nowhere with this scary guy who just threatened your life and scared you away, to like, so he told you he's 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's what happened to horses that got claw marks in them magically. Did you know that some people from that area thought that he did that? Very true" at approximately 26:06;
- (j) "that morning he knocked on [Reculard's] door 'time to do'. [Reculard] very shudderly packed her things into the truck, headed out. That whole ride, same thing, cursing her under his breath, being real awkward, and ugly with silence. That real passive aggressive stuff that he loves to do. Thankfully, when they hit service, [Reculard] told me that he indeed did change the plans, he said, 'I'm not taking you to Williams Lake,' and kept driving through. He wouldn't tell her. He would not tell her, I think, for a little over a half an hour, where they were actually going. That's 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 no out – has nothing. But he's going to dump her. And he's not

gonna dump her in Williams Lake, the only town she knows in Canada. Sounds a little psycho, doesn't it? Oh, and he hates that I'm telling all of this right now. And it's funny because I did receive a phone call from him doing damage control after all this, and it's the same shit he pulls in all lives. 'Oh, whoa'. Just beating around the bush. 'I just have to tell you, I had to cut the cancer out'. That's what he said about [Reculard]. I had to cut the cancer out. But he told you guys, 'oh he wishes her well. He's gonna bring her to a healing facility. He's gonna do this. He's hooked her up with a cool ranch'. No, he did not. He didn't tell her shit all..." at approximately 27:42;

- (k) *"he has this like sick stash of photos he goes to. He probably does voodoo rituals on them or something I wouldn't put it past him" at approximately 30:57;*
- (l) *he "wanted to exploit First Nations' land, First Nations' horses, [he] wanted money [he] wanted to make easy money [he] wanted to do everything [he] could so [he] could live for free off of everybody else's hard earned dollars" at approximately 34:11;*
- (m) *"[Reculard] honestly got every sign that he would murder [her]. And he was definitely giving [Reculard] signs that he was going to murder [her]" at approximately 42:52;*
- (n) *"no wonder he doesn't pay anyone who works on the Ranch that's so that's so they don't even have money. Yeah, so like say he wants to kick someone off the Ranch 'oh, you need me because you don't have any money" at approximately 44:11;*
- (o) *"his little fragile man ego got really upset, again, threw a hissy fit just like he did with [Reculard], again" at approximately 52:48;*
- (p) *"he said his favourite types of people to ask for money for are the ones that are on life, not life support, but hooked up to machines in hospitals, people who have no family but they have lots of money" at approximately 58:00;*
- (q) *"he finds people, he infiltrates their lives, he finds out their weaknesses" at approximately 59:00; and*

- (r) *“sickening that he preyed on sick people in hospitals. Absolutely, 1000%. That was what he told me. He was just like, ‘Oh, you know who my best funders are, are the people with no family’. Do you know what he tried to do before [Reculard] came to this country? He made sure she alienated herself from everybody”* at approximately 1:06:01,

(the **“Defamatory Livestream Video”**).

19. These statements in the Defamatory Livestream Video were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) he is a fraudster;
- (b) he enjoys making people feel awful about themselves;
- (c) he does not like strong women and likes to use people;
- (d) he is an incompetent rancher who neglects his horses;
- (e) he does not know anything about horses;
- (f) he has a toxic masculine ego, he kicked a woman out of the country because his feelings were hurt, he likes to imprison women on the Ranch and give them Stockholm syndrome and he has attempted to do so;
- (g) he threatened a woman in his vehicle while driving;
- (h) he trapped and verbally assaulted a woman in a vehicle for three hours and it appeared as though he would murder her;
- (i) he is the type of person who would murder someone and feed them to bears, and he may have put vanilla on horses to provoke bears into attacking them;
- (j) he took a woman, who was from a different country and didn't speak English very well, from the Ranch and abandoned her in a town she had never visited before, without connecting her with any local ranches or assisting her in finding a safe place to go;

- (k) he is a creepy man with a stash of photos of women he uses for voodoo rituals;
- (l) he wants to exploit other people, First Nations land and horses, all for his own financial gain;
- (m) he gave a woman signs that he was going to murder her;
- (n) he takes financial advantage of the employees at the Ranch;
- (o) he has a fragile ego and throws tantrums;
- (p) he exploits people who are sick in hospitals or who have no family for his own financial gain;
- (q) he infiltrates peoples' likes to find their weaknesses; and
- (r) same as (p) above.

20. The Defamatory Livestream Video had a peak of 107 concurrent viewers during the livestream.

21. On or about December 23, 2023, the defendant, Reculard, posted the following false and defamatory statements of and concerning the plaintiff during the Defamatory Livestream Video in the comments section of that livestream, including:

- (a) he *“doesn’t want any other man on the ranch cause, I quote ‘there can only be one stud up here’”*;
- (b) *“[Reculard] got every sign that he would murder [her]”*;
- (c) *“I know now it was all mental manipulation and torture tactics from the military”*; and
- (d) *“I need something to happen for the gram’ and all of a sudden [a horse] is full of wounds”*,

(the **“Reculard Defamatory Comments”**).

22. The Reculard Defamatory Comments were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) he is a creepy man who considers himself the “stud” for all the women on the Ranch;
- (b) he gave Reculard signs that he would murder her;
- (c) he used mental manipulation and torture tactics from the military on Reculard; and
- (d) he deliberately hurts horses to obtain social media likes and followers.

23. Between about December 22 and 27, 2023, McMillan posted a series of additional defamatory videos and stories on Instagram of and concerning the plaintiff as follows:

- (a) he talks *“to women all over the world, luring them to his Ranch with all these big hopes and dreams, catfishing people”*;
- (b) *“he pushed [McMillan] to start a non-profit to ‘funnel’ money”*;
- (c) *“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. All he has are brainwashed followers, a family who can never say anything against him or they also get treated passive aggressively, and a few people who line his pockets...”*; and
- (d) he is a *“volatile human, and [he] cause[s] mental health issues in every woman who leaves [his] Ranch”*,

(the **“Defamatory Instagram Serial Videos and Posts”**).

24. These statements in the Defamatory Instagram Serial Videos and Posts were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) he deceptively lures women to his Ranch;
- (b) he is a fraudster;
- (c) he is a conman who silences women and brainwashes people; and
- (d) he is an unstable man who causes women leaving his ranch to have mental health issues.

25. On or about February 2, 2024, Lamar published a false and defamatory Instagram comment of and concerning the plaintiff stating *“he stopped his truck and threw the guy out of his truck and left [sic] in there in the middle of nowhere and took off with his camera equipment. Eventually he paid the guy for it, but yep”* (the **“Lamar Defamatory Comment”**).

26. The Lamar Defamatory comment is false and defamatory of and concerning the plaintiff by legal innuendo in that it conveyed to one or more third parties who know the following extrinsic facts below that Lares is an unreliable employer who forced his cameraman to be left at an isolated location without a valid reason while driving with his cameraman to the Canadian border:

- (a) “he” is Lares;
- (b) “the guy” is a cameraman named Chris Brent whom Lares had hired in the U.S.A. to accompany Lares, Skeels and other third parties on a road trip from the U.S.A. to the Ranch; and
- (c) “the middle of nowhere” is an isolated location south of the U.S.A. – Canada border in Washington State.

27. The true facts concerning the Lamar Defamatory Comment are that Chris Brent had to leave the road trip he was on with Lares, Skeels and others before crossing the border from the U.S.A. into Canada, for reasons outside of Lares’ control.

28. On or about February 15, 2024, McQuade published a false and defamatory Instagram story intending to interfere with the plaintiff’s business deal for the Company with Rovor Sport which consisted of a picture of the plaintiff with the words *“I wouldn’t want a certain someone showing it off but its your brand”* and tagged Rovor Sport in the post (the **“Defamatory Sport Post”**).

29. The Defamatory Sport Post was false and defamatory of and concerning the plaintiff in its literal and ordinary meaning, or alternatively, it conveyed, as its natural and ordinary inferential meaning concerning the plaintiff to the average reader, that he is an unethical individual whose association with a brand could bring that business' reputation into disrepute.

30. On or about February 15, 2024, the defendant, Andrews, posted the following false and defamatory statements of and concerning the plaintiff on her Instagram story including:

(a) showing a picture of the plaintiff with the statement:

i. *"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",*

(b) showing a picture of the interior of a cabin at the Ranch with the statements:

i. *"And def add in the fraud and theft of investments and the huge amount of people he abused for trying to speak out"; and*

ii. *"All the above mentioned, he also cons women to come work for free in the guise of 'teaching them' yet it's him that was being taught and getting free work and then defaming and slandering the women who spoke out",*

(c) showing a picture of the plaintiff with the statement:

i. *"Scamming charity's, manipulating angel investors, abusing women he conned into working for him for free",*

(the "**Andrews Defamatory Posts**").

31. The Andrews Defamatory Posts were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

(a) i. he lies to and controls his family;

ii. he is attempting to create a cult like commune which takes people from other countries hostage if they don't help him launder money;

- (b)
 - i. he is a criminal who engages in fraud, steals investments, and abuses people;
 - ii. he cons and abuses women;
 - iii. he defames and slanders women who speak publicly about his abusive treatment of them; and
- (c) he abuses and tricks women into working for free on his Ranch.

32. On or about May 27, 2024, McQuade posted an Instagram reel to her story describing the Company as the “*Lying L Ranch*” and making the following false and defamatory statements of and concerning the plaintiff:

- (a) describing the plaintiff’s operation of the Ranch as “*one of the biggest scams going*”; and
- (b) that there is “*fundraiser after fundraiser [with] lots of money roll in and pretty much none of it go to the horses....*”,

(the “**McQuade Defamatory Instagram Story**”).

33. The McQuade Defamatory Instagram Story was false and defamatory of and concerning the plaintiff in its literal and ordinary meaning, or alternatively, it conveys the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) he uses the Ranch to scam people out of money; and
- (b) he uses fundraising money for the Ranch for improper purposes.

34. On or about June 29, 2024, McQuade and McMillan published the following approximately 1 hour and 42 minute false and defamatory livestream video on Instagram of and concerning the plaintiff in which they stated as follows:

- (a) “*he was being shady about business stuff, and I would sit down with my admin team and talk about things like, you know, and he was always so careful like would do things on the phone. Would never send it via email. It would always be like, in some way, that wouldn’t be, like, legit, so he couldn’t have a paper trail or anything right, so there was always business deals over the phone. So, I would get, like,*

phone calls a couple times a week where it would just be 3 hours on the phone and he would poke into my life and ask me everything that's going on with my life to get me to open and then let my guard down. Yeah. And this is apparently a tactic he uses with everybody, which is how he brings in all the dollars through fundraisers because he pulls on people's heartstrings. He knows where to get them it's so like, 'Wow, you are really good at this being creepy and manipulative' “ (McMillan) at approximately 2:16;

- (b) he is *“just an awful person”* (McMillan) at approximately 4:53;
- (c) *“Well even towards the end, which I knew he was trying to do, but like he was trying to make it, make me even believe that I physically couldn't do any of the work because of my MS and that it just wouldn't work out and that like I should really reconsider but I think he knew that I already was like, onto his shit. He likes to let people hang themselves”* (McQuade) at approximately 5:23;
- (d) *“he won't let his children have real friends”* (McMillan) at approximately 12:47;
- (e) he *“brings women over to entertain his family, specifically young women, because he does not allow them to have any close friends in the area because everybody there hates him.”* (McMillan) at approximately 19:15 *“Yeah, preferably no car”* (McQuade) at approximately 19:26;
- (f) *“don't dance with the cowboys tonight, ladies, because if you do, you're insulting the family, and you will get told that you have to go back to the Ranch. And you will get driven there by a psycho scary man screaming at you, and he will tell you he will leave you in the woods for the bears to find you and then make you terrified for your life...”* (McMillan) at approximately 29:42;
- (g) *“so then they have to go back to the room where [Reculard is] packing up her stuff. [Lares' son is] sitting at the end of the bed. The son is sitting at the end of the bed. 'Like this sucks. My dad always does this. He's so awful. He doesn't even love me.' And his dad even told me that he's worried about his son being a psychopath killer and murdering animals for fun. Like that's what he said about his son. Like do you love your son? 'Cause we love him, like what about you? Your psycho man...”* (McMillan) at approximately 34:54;

- (h) *“people in the nation hate him because he racked up a giant debt with their, with their nation, he got fired, there was an opportunity for the land to be sold back to the Xeni Gwet’in and the original business deal was he was supposed to actually supposed to reach out to the Xeni Gwet’in and let them know and did he do that, no...”* (McMillan) at approximately 37:45;
- (i) *“well, we know he is a fan of mail-order brides, so of course he is a fan of captive wild stallions”* (McMillan) at approximately 57:46;
- (j) *“why are there no dude wranglers up here like you could have some serious, like some seriously, knowledgeable guys come work for you, and he goes “there is only room for one stud up here”* (McMillan) at approximately 58:36;
- (k) *“when [Reculard] was there, I think she said there was like \$5,000 raised for just [one horse] to get castrated and brought to the vet and stuff, and that didn’t even happen he didn’t go to the vet, and he almost bled out when he got when he got castrated”* (McMillan) at approximately 59:44; and
- (l) *“there’s people trying to call on him to get his books and his financials, and I bet you he is trying to cook his books right now, bet you anything he is cooking books”* (McMillan) at approximately 1:04:36,

(the **“Defamatory 2024 Livestream Video”**).

35. These statements in the Defamatory 2024 Livestream Video were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) he is an unethical businessman who conducts business in an improper, manipulative manner;
- (b) he is an awful person;
- (c) he is a manipulative employer;
- (d) he will not allow his children to have real friends;
- (e) he isolates and controls his family and the Ranch work-aways;

- (f)
 - i. he takes advantage of young women by bringing them to the Ranch to entertain his family;
 - ii. he is an unstable man who has threatened to murder a woman;
- (g) he is a psychopath who doesn't love his son and tells people that his son is a psychopath who kills animals for fun;
- (h) he was fired by the Xeni Gwet'in because he was a bad employee who caused that First Nation to go into a significant amount of debt; and
- (i) he likes mail-order brides;
- (j) he is a creepy man who considers himself the "stud" for all the women on the Ranch;
- (k) he castrated a horse instead of allowing a veterinarian to do that; and
- (l) he is a fraudster who illegally modifies his business records.

36. The Defamatory 2024 Livestream Video had a peak of 82 concurrent viewers during the livestream.

37. Between about late June to early July 2024, McMillan and McQuade published the following false and defamatory comments of and concerning the plaintiff on Instagram stories as follows:

- (a) describing the Company as the "*Lying L Ranch*" (McMillan and McQuade);
- (b) "*stop supporting this liar at Flying L Ranch*" (McMillan);
- (c) asking the viewer to "*stand with the victims of the Lying L*" (McMillan);
- (d) "*weed his fake account out*" (McMillan);
- (e) he is "*the baddest bully of them all*" (McMillan);
- (f) he is "*stalking [the defendants] via fake accounts*" (McMillan);
- (g) he is a "*manipulative maniac*" (McMillan);

(h) *“he just gets young girls to work for him so his son has friends for the summer”* (McMillan); and

(i) *“he is a monster”* (McMillan),

(the **“Defamatory Instagram Stories”**).

38. These statements in the Defamatory Instagram Stories collectively were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

(a) he is a liar who is dishonest in his business dealings;

(b) there are victims of his unethical, abusive, or criminal behavior;

(c) he is a bully;

(d) he stalks people online and using fake social media accounts;

(e) he is an unstable, manipulative person;

(f) he uses young women as employees so his son has friends; and

(g) he is a monster.

39. In or about the fall of 2024, the defendants, John Doe or Jane Doe or one or more of the other defendants, published the following false and defamatory comments of and concerning the plaintiff by creating the defamatory website called the whistleblower.ca which states:

(a) *“Michael’s lack of transparency and accountability, his cyberbullying, intimidation tactics, and untruthful statements, all add up to create the general impression things at Flying ”L” Ranch are not as he says, nor as he would like us to believe”;* and

(b) *“Ponder why there’s a never-ending parade of new fundraising schemes and campaigns for any number of ‘projects’? Or why Michael steadfastly refuses to be transparent or accountable about these donations?”,*

(the **“Defamatory Website”**).

40. The statements in the Defamatory Website were defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) i. his business lacks transparency and accountability;
- ii. he is a cyberbully who uses intimidation tactics; and
- (b) he uses donations in an illicit or illegal manner.

41. On or about August 27, 2024, the defendants, John Doe or Jane Doe or one or more of the other defendants using the email thewhistleblowercanada@proton.me published the following false and defamatory email to several individuals which include the following false and defamatory statements of and concerning the plaintiff:

- (a) his actions “*may constitute financial elder abuse which may be summarized as ‘illegal use, misuse or concealment of funds, property, assets or benefits for someone else’s gain’*”;
- (b) he has “*a complete absence of transparency and accountability about donations*”;
and
- (c) such further and other particulars as may become known,

(the “**WhistleBlower.ca Email Defamation**”).

42. These statements in the WhistleBlower.ca Email Defamation were defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinal inferential meanings concerning the plaintiff to the average reader:

- (a) he has committed elder abuse by taking financial advantage of an elderly man;
and
- (b) he is not transparent or accountable about his receipt of donations.

43. On or about October 16, 2024, McQuade posted an Instagram reel scrolling through the pages of the Defamatory Website (the “**McQuade Defamatory Website Instagram Reel**”). Around this time, McQuade also posted a link to the Defamatory Website on her Instagram biography.

44. As of February 3, 2025, the McQuade Defamatory Website Instagram Reel had 57 likes, 59 comments and has been shared 16 times.

45. In or around December 2024, McQuade published a false and defamatory Instagram comment concerning the plaintiff on the McQuade Defamatory Website Instagram Reel which states *“he also doesn’t pay people, holds them hostage, threatened to beat a girl up for not dancing with his son, ... and Keeps all the donation for himself”* (the **“McQuade Defamatory Website Instagram Reel Comment”**).

46. The McQuade Defamatory Website Instagram Reel Comment was false and defamatory of and concerning the plaintiff in its literal and ordinary meaning, or alternatively, it conveys the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) he does not pay the employees of the Company;
- (b) he is a criminal who holds people hostage;
- (c) he threatened to assault a woman for not dancing with his son; and
- (d) he keeps all the money people donate to the Company for his own personal use.

47. Between about February and December 2024, the defendant, Prescott a.k.a. “Cooper Whisper” published the following false and defamatory statements of and concerning the plaintiff on Instagram including:

- (a) *“he has 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”*;
- (b) sharing the following Instagram stories created by the defendant McQuade:
 - i. the McQuade Defamatory Instagram Story;
 - ii. a story with an image of McQuade drinking out of a mug stating *“careful to the wranglers of the Lying L. – Don’t you dare dance with other cowboys or you may be chucked into a truck, held against your will and driven 3hours off grid by a screaming man upset you didn’t dance with his son”*, and *“These are decent women who were victimized by a monster because they had minds of their own and wouldn’t comply”*;

- iii. the defendant McQuade's reel sharing the Defamatory Website; and
- (c) posting a picture of the plaintiff and his family which states "*the Wannabees*" on her story,

(The "**Prescott Defamatory Posts**").

48. The Prescott Defamatory Posts were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they collectively convey the following natural and ordinal inferential meanings concerning the plaintiff to the average reader:

- (a) he is a dishonest individual;
- (b) he is a scammer who uses money from fundraisers for improper means;
- (c) he assaulted a woman by throwing her into a truck, holding her against her will, and screaming at her for three hours;
- (d) he is a monster who victimizes decent women if they do not do what he wants;
- (e) his business lacks transparency and accountability;
- (f) he is a cyberbully and uses intimidation tactics;
- (g) he uses donations in an illicit or improper manner; and
- (h) he is an incompetent rancher.

49. The Prescott Defamatory Posts, except the comment set out in 46 (a), as of February 3, 2025 are posted on Prescott's Instagram page "Cooper Whisper" in the Instagram highlight titled "Interesting".

50. On or about January 29, 2025, McQuade published the following false and defamatory Instagram comments, of and concerning the plaintiff:

- (a) "*I just hope she knows how he has treated his past visitors. Especially if It doesn't work out exactly how he 'masterminds' it. Or maybe she is Dylan's new love interest he handpicked again*";
- (b) "*Holy terror would be a great name for the ranch*"; and

- (c) *“In other words his comment translates to let me use your [YouTube] following and your face to milk my followers for more donations that don’t really go to the horses”,*
- (the **“McQuade 2025 Defamatory Comments”**).

51. The McQuade 2025 Defamatory Comments were false and defamatory of and concerning the plaintiff in their literal and ordinary meanings, or alternatively, they convey the following natural and ordinary inferential meanings concerning the plaintiff to the average reader:

- (a) i. he has mistreated visitors to the Ranch;
- ii. he hires work-aways so they can be love interests for his son;
- (b) he owns and operates a business that terrorizes people; and
- (c) he improperly solicits and misuses donations from his followers.

52. As of February 19, 2025, Prescott’s Instagram account “Cooper.Whisper” had 103 followers, McMillan’s Instagram account “thedevyndestinee” had 6,464 followers, McQuade’s Instagram account “kristymcquade” had 3,812 followers, Lamar’s Instagram account “lamardeven” had 108 followers, and Andrew’s Instagram account “oh_alisse” had approximately 29,200 followers.

53. As of March 14, 2025, the Defamatory Website remains online and accessible to the public.

54. The above publications summarized in paragraphs 11 to 51 (collectively, the **“Defamatory Statements”**) were false and had the false and defamatory meanings as set out above, which tended to lower the plaintiff’s reputation in the estimation of right-thinking members of society or expose him to contempt or ridicule.

55. In or about February 2024, cease and desist letters had been sent on the plaintiff’s behalf to Lamar, Skeels, Reculard, McMillan, McQuade and Andrews concerning defamatory publications that they had posted online at that time.

56. Despite these letters, Lamar, Skeels, Reculard, McMillan, McQuade, and Andrews have published one or more of the Defamatory Statements.

57. By reason of the above noted publications, the plaintiff's personal and business reputation has been seriously injured and the plaintiff has suffered damages, including loss of self-respect, dignity, good character and reputation.

58. The defendants made the above noted publications with express malice, and with reckless disregard for their truth or without any basis in fact or willfully blind to the facts, and the Defamatory Statements were high handed and display a wanton and flagrant disregard for the plaintiff's reputation, including through allegations of criminal activity.

59. The entire conduct of the defendants before and after the commencement of this action justifies increased or aggravated damages.

60. Unless they are restrained from doing so, the defendants will continue to publish or republish the Defamatory Statements or similar defamatory statements, or similar statements will be republished by third parties on the internet unless restrained from doing so.

Part 2: RELIEF SOUGHT

61. The plaintiff claims against the defendants as follows:

- (a) general damages for defamation;
- (b) special damages;
- (c) aggravated damages;
- (d) punitive damages;
- (e) special costs, or in the alternative, costs;
- (f) an interim, interlocutory, and/or permanent injunction to enjoin and restrain the defendants, by themselves, their agents, servants or otherwise, from, directly or indirectly, further writing, posting, disseminating, or causing to be written, posted, or disseminated, or otherwise publishing of the plaintiff the alleged, or anything similar to the Defamatory Statements;
- (g) an order that the defendants:

- i. immediately remove all references to the plaintiff from their Instagram accounts, or anywhere else the Defamatory Statements appear, and all other sites or accounts owned or controlled by the defendants, directly or indirectly, and instruct the recipient(s) of those sites or accounts to do the same;
- ii. not in the future communicate any defamatory and/or disparaging comments, directly or indirectly, about or referring to the plaintiff, by any means, including without limiting the generality of the foregoing, the internet, email, social media website, or any other means or method;
- iii. are prohibited from publishing or causing to be published any such defamatory statement in the defendants' own names, in the name of any nicknames, pseudonyms, or aliases they now use, has used, or may use in the future; and
- iv. are prohibited from publishing or causing to be published any such statement about the plaintiff, anonymously, or in the name of another person. Without restricting the generality of the foregoing, this order will prohibit the defendants from using the device or technique of "anonymous re-mailing" to publish or republish any defamatory statement of or concerning the plaintiff,

(the "**Permanent Injunction**");

- (h) an order that any third parties, including Instagram, or any other social media or internet service provider or site, who have published, posted, distributed, or who have otherwise repeated defamatory comments by the defendants about the plaintiff, including the Defamatory Statements, now or at any time in the future, are directed to assist the plaintiff and this Honourable Court in the enforcement of this Permanent Injunction, including the removal of any defamatory comments about the plaintiff from their websites, email, and/or internet and any other form of publication or distribution. This includes, without limiting the generality of the foregoing, any website, social media site, blog, news groups, chat site, text message, email or any other electronic means;

- (i) an order that the defendants provide the solicitors for the plaintiff a complete list and copies of all persons who assisted in creating or drafting or posting the Defamatory Statements, or creating or optimizing any of the websites or chat groups where the Defamatory Statements appear, or who repeated or reposted any portion of the Defamatory Statements;
- (j) an order that the defendants provide the solicitors for the plaintiff a complete list of all other publications and communications in any form (videos, audio recordings, websites, emails, letters, and conversations) that the defendants have made about the plaintiff, including, for each, the means of communication, the recipients, and the dates; and
- (k) interest pursuant to *Court Order Interest Act*, RSBC 1996, c. 79; and
- (l) such further other relief as this Honourable Court deems just.

Part 3: LEGAL BASIS

62. The defendants have committed the tort of defamation, specifically libel, by publishing the Defamatory Statements, all of which have caused damages to the plaintiff, and which are particularly high-handed and malicious, warranting general, special, aggravated and punitive damages.

Plaintiff's address for service:

McQuarrie Hunter LLP
Barristers and Solicitors
15th floor – Central City Tower
1500 – 13450 – 102nd Avenue
Surrey, BC, V3T 5X3
Attn: Royal J. Morton
Phone: (604) 581-7001

Fax number address for service (if any): n/a

E-mail address for service (if any): rmorton@mcquarrie.com AND bpoth@mcquarrie.com

Place for trial: New Westminster, British Columbia

The address of the registry is: 651 Carnarvon Street, New Westminster, BC

Date: March 18, 2025.



Royal J. Morton
Signature of lawyer for plaintiff

Rule 7-1 (1) of the Supreme Court Civil Rules states:

(1) Unless all parties of record consent or the court otherwise orders, each party of record to an action must, within 35 days after the end of the pleading period,

(a) prepare a list of documents in Form 22 that lists

(i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and

(ii) all other documents to which the party intends to refer at trial, and

(b) serve the list on all parties of record.

APPENDIX

Part 1: CONCISE SUMMARY OF NATURE OF CLAIM:

Claim for damages and injunctive relief for defamatory online posts and videos.

Part 2: THIS CLAIM ARISES FROM THE FOLLOWING:

A dispute concerning:

- contaminated sites
- construction defects
- real property (real estate)
- personal property
- the provision of goods or services or other general commercial matters
- investment losses
- the lending of money
- an employment relationship
- a will or other issues concerning the probate of an estate
- a matter not listed here

Part 3: THIS CLAIM INVOLVES:

- a class action
- maritime law
- aboriginal law
- constitutional law
- conflicts of law
- none of the above
- do not know

Part 4:

N/A

NO.
NEW WESTMINSTER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

MICHAEL LARES

PLAINTIFF

AND:

DEVYN MCMILLAN, JONATHAN SKEELS, KRISTY MCQUADE, DEVEN LAMAR, ELISE
RECLARD, ANDREA PRESCOTT, ALISSE ANDREWS, JANE DOE and JOHN DOE

DEFENDANTS

NOTICE OF CIVIL CLAIM

Royal J. Morton
McQuarrie Hunter LLP
Barristers & Solicitors
#1500, 13450-102 Avenue
Surrey, BC V3T 5X3
Tel: 604-581-7001

File No.: 240945