

John 3B

From: The Mortgage Station <info@themortgagestation.ca>
Sent: December 27, 2023 1:07 PM
To: John Ironside; John 3B
Subject: ATTN: Mr. Ironside - Please acknowledge service
Attachments: Libel and Slander Notice Ironside.pdf

Mr. Ironside

Please see attached Section 5.1 Notice under the *Liabile and Slander Act* served upon you. Please acknowledge service.

You have until January 5, 2024, to remove the defamatory material from all your website and cease any further defamatory statements.

Served to you on behalf of the Mortgage Station and the brokers that you have repeatedly named.

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877.512.0007 Toll Free
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This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify The Mortgage Station immediately by email at info@themortgagestation.ca Thank you.

Date: December 27, 2023

To: John Ironside
Five Points Media
Five Points Media – Facebook
Five Points Media – Youtube
Big Blue Box Studios
OCANetwork
3bsolutions
themortgagestation.tv

jironside@fivepointsmedia.ca

RE:

Mr. Ironside:

We had hoped that you would have conducted yourself as a professional journalist but as the past year has shown this simply isn't the case. Instead of reporting facts you have created a campaign that appears to be more of a business plan to appear like a victim in order to further your career with little regard to the truth.

We have avoided dealing with you as your history has shown that you get into feuding with people and quite frankly, we are not interested. It appears you failed to learn a lesson when, in 2017, the Superior Court noted your behaviour in the ruling of *Ironside v. Roskam*, 2017 ONSC 7416. While you did win the application the court stated the following:

... The problem is that the Applicant [John Ironside] himself has been involved in the same type of behaviour against Mr. Roskam. The Applicant has posted videos about Mr. Roskam on his own websites, has followed Mr. Roskam around at events, and has made inappropriate remarks about Mr. Roskam online in a very similar way. While the Applicant characterizes these remarks as "political commentary", I cannot accept that these comments are directed exclusively at furthering political discourse. In my view, they are also very much personal attacks on Mr. Roskam. In short, the Applicant has come to this Court seeking relief with "unclean hands". Accordingly, I am not prepared to grant the relief he seeks.

The court listed out your own unacceptable behaviour which included making videos, demanding an interview, letters to 3rd party people and the pursuit of an exposing documentary called, "Hypocrisy in Hazzard County".

These examples referred to by the Superior court is minor compared to the ongoing campaign you have created that is the subject of this letter. The Superior court would

most likely have awarded you exemplary damages in your case against Roskam, however, the court ruled,

In the circumstances of this case, I am not prepared to make an award of exemplary damages. If the Applicant [John Ironside] was not so implicated in provoking Mr. Roskam's behaviour, the situation would be different. However, I am not going to weigh in on this feud by granting exemplary damages against Mr. Roskam.

A professional journalist doesn't engage in feuds or provoking people. As the court stated, "the Applicant [John Ironside] has come to this Court seeking relief with 'unclean hands'."

Your posts reveal that you rejoice in the possibility of legal action against you and that you are aware of the SLAPP regulation. You fail to consider that any legal actions you take would take into account your history to provoke and to engage in a feud that goes on for years.

In any SLAPP application the court would consider your posted views whereby you claim that our failure to take legal action proves our guilt. Our silence merely reflects our willingness to overlook the false stories you post. However, your logic is that the court should believe we are guilty if we failed to sue but any lawsuit we file is a violation of the SLAPP rules.

We would suggest to you that the court will ask whether you are coming to the court with clean hands and did you provoke a legal action by your conduct?

The one-sided feud you have created isn't in the interest of the public but your own self-interest of presenting yourself as a victim in order to create career opportunity for yourself.

What the facts are is that you were in a difficult spot whereby you needed \$2000 because you didn't have the financial resources to make your next mortgage payment and avoid being in default. Apparently, you didn't have any family, friends or business associate willing to help you so you turned to our company. While we normally do not provide for these types of loans, we did take it upon ourselves to help a fellow human being in need. Without our help you would have been in serious problems.

Instead of thanking people who helped you, you wanted to turn the event into something it is not. You suddenly became the victim and used the kindness of our brokers to further your career.

It is unfortunate there are people who use others. You claim to be overcharged a few hundred dollars – certainly no one here is attempting to get rich from your \$200. However, you turned your fake story into some government corruption case involving the police. Apparently, the Chief of the Police and serious investigators are all lining up

to get their portion of \$200. In your view there is so much money (\$200) that several people are quick to commit criminal offenses.

In your world all you see is evil – so very sad.

S. 5(1) Libel and Slander Act Notice:

We say the above in the hopes that you will take seriously the notice below issued to you under the *Libel and Slander Act*. The court will see we have done our best not to engage you but your desire for a feud appears to have controlled you.

We take the position that notice is not required under the *Libel and Slander Act* for the medium in which you chose to publish your defamatory statements. Without prejudice to that position, if notice is required this letter constitutes notice under the *Libel and Slander Act* that your statements are actionable.

This notice is served to you on behalf of The Mortgage Station also known as Verico The Mortgage Station (“Station”) and on behalf of David Flude (“David”), Lisa Purchase (“Lisa”) and Renee Dadswell (“Renee”) collectively known as “Station Brokers”.

It should be noted that you have over 21 posts on Facebook, 6 stories on Five Points Media, 4 videos on Facebook and dozens of links to other stories posted by you just in the last 6 weeks. There are dozens of other stories, posts, etc. over the past year. As such, many of the defamatory statements we provide notice for are repeated throughout your online posts at your various websites.

As such, it is impossible to list out every occurrence of defamation that you have posted and repeated on your website. Even within each story there are multiple links to older stories which are included in this notice.

It also should be noted that your posts demonstrate that there are staff and other people helping you both create the videos, stories and posts. As such, these people, once their names are disclosed, are also liable for the defamation.

Five Point Media Website Posts (“Five Points”):

The following stories were posted at www.fivepointsmedia.ca over the past 6 weeks.

- A) Improvements Boost Awareness About Broker Usury During The Busy Spring Mortgage Season – posted December 13, 2023 ([Link](#))

Attached as Exhibit “A”, also as Exhibit “B” from Youtube

The Five Points post contains the following:

- 1) “verico-the-mortgage-stations-loansharking-in-lefroy”

- 2) “the brokers at [Verico the Mortgage Station](#) are intent on [continuing to hide](#) from [their own criminal and ethical abuses...](#)”
- 3) “ the changes are all being made because David Flude and his brokers Renee Dadswell and Lisa Purchase are determined to drag this story, and [everybody with whom they do business](#), down a one-way rabbit hole to financial losses rather than face reality and take responsibility for what they did.”
- 4) “As journalists, we have seen this pattern before, twice in fact, and [in both cases, the prideful perpetrators held on, confident in their ability to con others, right up to the point of losing it all and being closed down due to too many people learning the truth about who they really are and what they had done.](#)”
- 5) “There is only one reason why the owners of a multi-million-dollar brokerage and their allies from a multi-billion-dollar bank would hide from and refuse to meet with the producer of a small, not-for-profit media company that is dedicated to helping the most vulnerable of its community.”
- 6) “Our goal remains to warn potential clients how the brokers at [Verico the Mortgage Station](#) charge [illegal levels of interest on short-term financing to their potentially vulnerable senior clients](#), which is a crime known as usury, or loan sharking, that carries a punishment of up to five years in prison.”
- 7) “We have not implemented [all the updates that the SEO specialist suggested](#), as our story about [loan sharking](#) and [pathological lying](#) to avoid investigation at [Verico the Mortgage Station](#) is currently being told through [our community channel](#), which is dedicated to socially relevant stories and charitable services.”
- 8) “Our reports and videos have been viewed by about 750,000 people so far, so we are focusing more now on quality than speed.”
- 9) “Those “regulatory requirements’ are put in place to protect clients of brokerages from crimes like usury, or loan sharking, but David Flude did not seem to believe that they applied to him.”
- 10) “The simple truth is that this story, about the exposure of the crimes of the brokers at [Verico the Mortgage Station](#) and the involvement of the lenders, never had to happen. Eighteen months ago, David Flude had a single ‘regulatory requirement’ to complete a report for the [Financial Services Regulatory Authority of Ontario \(FSRA\)](#) and submit it to the agency. However, the Principal Broker of [Verico the Mortgage Station](#) did not want to have to explain how [Renee Dadswell had committed the crime of usury](#), which is an indictable offence that is punishable by a prison term of up to five years, or how [Lisa Purchase dragged out and delayed the ‘three-week’ mortgage process to nine weeks to force the mark, our producer, to be forced to accept the illegal terms of the financing](#), and to coerce him to accept a

private mortgage at a much higher rate, which likely meant more commission being paid to her.”

- 11) “Regardless, the brokers of [Verico the Mortgage Station](#) seem incredibly comfortable lying about our motives, with David Flude calling our producer an 'agitator' [when trying to convince a woman to still hire him after she had seen our articles.](#)”
- 12) That concern for their public image and their desire to cover up their actions with deception would also explain why [they would go so far as to 'motivate' a detective of the South Simcoe Police Service to omit and falsify evidence.](#)”
- 13) “Few people who work in the world of charities and helping others would fight as we are doing, but our producer is also a veteran and he does not stand back and watch as businesses of questionable ethics defraud honest people.”
- 14) “instead of taking responsibility, the brokers at [Verico the Mortgage Station](#) are trying to manufacture a way out of this mess of their own creation, as a phenomenal number of random people in cities and towns across the province [are scrutinizing every article we posted last year](#)”
- 15) “Once again, in that case, [we put our cards on the table face up for all to see through online video and articles](#), and we publicly exposed abuses of the civil justice system [as we posted the threat of frivolous legal action, known as a Strategic Litigation Against Public Participation \(SLAPP\) lawsuit, and our response](#). We brushed off the threat of abusive litigation using the law as our rapier, and we never heard back ever again from the big bad scary lawyer.”

The normal and common understanding of these statements would that the Station and Station Brokers are:

- 1) Conspiring in an ongoing criminal con against average people;
- 2) Conspiring in an ongoing criminal con against seniors;
- 3) Conspiring in an ongoing criminal con against veterans;
- 4) Engaged in a criminal coverup with Police;
- 5) Engaged in a conspiracy to create false evidence;
- 6) Engaged in an ongoing loansharking scheme;
- 7) Engaged in an ongoing illegal coverup with the public;
- 8) Engaged in an ongoing criminal conspiracy with multi-billion dollar banks;
- 9) That “everyone” they do business with are conned resulting in “financial losses”;
- 10) That the business is going to be closed down due to its illegal activities;

- 11) That the Station Brokers have engaged in criminal activities;
- 12) Have a business plan to con average people, seniors and veterans for profit;
- 13) That David believes he is above the criminal law;
- 14) That the Station Brokers are engaged in multiply crimes;
- 15) That they have failed to comply with the Financial Services Regulatory Authority of Ontario;
- 16) That the Station Brokers are engaged in coerce people in higher mortgage rates;
- 17) That the Station Brokers have not already denied and/or contested the allegations.

The video posted with the YouTube copy of this story are various images of bank logos then the Station logo altered to include the words "LOAN SHARKS" and "PATHOLOGICAL LYING". This video would have the normal and common understanding to mean:

- 1) The Station Brokers are engaged in loan sharking or related illegal activities;
- 2) The Station is conspiring with various banks;
- 3) The Station Brokers repeatedly lie to the public regarding mortgages;
- 4) The Station and its Brokers are untrustworthy and are criminals.

We find it interesting that while you claim our silence and failure to file a lawsuit or seek an injunction is proof we are involved in criminal activities, you also state that if we do file a lawsuit or seek an injunction then it is an "abuse of the civil justice system".

This posted story also demonstrates your efforts to get broad exposure while contacting 20 different banks. Clearly this isn't standard procedure for news outlets. Your claims of increased exposure only increases the damage you have caused and thereby increases your liabilities. It is noted in this story that you are claiming to have reached 750,000 people.

B) Mortgage Lenders Now Warned About Crimes Committed At Verico the Mortgage Station – posted December 11, 2023 ([Link](#))

Attached as Exhibit "C", also as Exhibit "D" from Youtube

The Five Points post contains the following:

- 1) "our allegations of usury, pathological lying, and defiance of 'regulatory requirements'"
- 2) "fragile construct of alternate reality generated by David Flude, Lisa Purchase, and Renee Dadswell. So far, all those facts also apply equally to the management team at HomeEquity Bank."
- 3) "What could we possibly have that would elicit this level of fear within multi-million-dollar and multi-billion-dollar corporations?"

- 4) Most people understand that only the guilty hide, and that people of substance stand up and refute false claims made against them. So, is there a viable reason why any of these people have refused to say a single word to contest our claims, other than their guilt?
- 5) We currently hold an unusual position of having posted allegations of serious criminal acts that have remained uncontested for an unprecedented period of eighteen months, which is unheard of, as even the lowest of the low will deny allegations made against them, or at least have their lawyer do so on their behalf.
- 6) "...David Flude has shown that he is quite capable and willing to lie at a pathological level, especially when trying to evade 'regulatory requirements'."
- 7) "Unlike the brokers at Verico the Mortgage Station and their allies at HomeEquity Bank, we have nothing to hide, which is why we choose to present everything."
- 8) "The management team at HomeEquity Bank may have chosen to set aside their ethics in this matter and to prioritize profit over the financial security of their often-vulnerable clientele of seniors and veterans, but we doubt that will be the case when it comes to household names like Scotiabank and Toronto Dominion. They have a public image to maintain, and they will not want their names associated with a story about loan sharks defrauding seniors that is being reported by a credible, well-established, not-for-profit media channel that has a hard-earned reputation for helping their shared community."
- 9) "These reputable financial professionals will also likely understand that ethical police detectives do not assess allegations of loan sharking by omitting the evidence of the crime, and then claiming insufficient evidence. That is like saying they cannot arrest a drug dealer because during the raid they were 'motivated' to flush the heroin down the toilet. The actions by Detective Muto, which apparently proved acceptable to top brass at the South Simcoe Police Service, are utterly unconscionable. That is why his choices, including the inaccurate and dubious results of his math, are pending review by the Office of the Independent Police Review Director. They will also likely be investigated by less easily motivated detectives of the Ontario Provincial Police Financial Crimes Division."
- 10) "Those investigators will also be interested in why the detectives of the South Simcoe Police Service shelved our evidence for a year and then tried to whitewash their investigation by ignoring the complainant."
- 11) "The brokers at Verico the Mortgage Station have done nothing but hide, and for reasons unknown, but most likely motivated by greed, the management team at HomeEquity Bank have chosen to turn a blind eye and enabled them. The

management team at [HomeEquity Bank](#) has also never contested our allegations nor questioned the validity of our evidence.”

The normal and common understanding of these statements would be that the Station and Station Brokers are:

- 1) Conspiring in an ongoing criminal con against average people;
- 2) Conspiring in an ongoing criminal con against seniors;
- 3) Engaged in a criminal coverup with Police;
- 4) Engaged in an ongoing loansharking scheme;
- 5) Engaged in an ongoing illegal coverup with the public;
- 6) Engaged in an ongoing criminal conspiracy with multi-billion dollar banks;
- 7) That the Station Brokers have engaged in criminal activities;
- 8) That they have failed to comply with the Financial Services Regulatory Authority of Ontario;
- 9) That the Station Brokers have not already denied and/or contested the allegations.

The video posted with the YouTube copy of this story are various images of bank logos then the Station logo altered to include the words “LOAN SHARKS” and “PATHOLOGICAL LYING”. This video would have the normal and common understanding to mean:

- 1) The Station Brokers are engaged in loan sharking or related illegal activities;
- 2) The Station is conspiring with various banks;
- 3) The Station Brokers repeatedly lie to the public regarding mortgages;
- 4) The Station and its Brokers are untrustworthy and are criminals.

This story has three images embedded in the story. The first image is of David Flude with the caption, “Knew his broker was loan sharking seniors, then lied six times in two emails to evade FSRA investigation.” The common understanding of this caption would be:

- 1) David is part of a conspiracy;
- 2) David supports loan sharking;
- 3) David supports defaulting seniors;
- 4) David is part of a cover up;
- 5) David knowingly engaged in criminal activity; and,
- 6) David is untrustworthy.

The Second image is of Renee Dadswell with a caption, "Loan sharked senior and veteran through short term loan at 198.23 per cent interest."

- 1) Renee is part of a conspiracy;
- 2) Renee supports loan sharking;
- 3) Renee supports defrauding seniors;
- 4) Renee supports defrauding veterans;
- 5) Renee is engaged in criminal activities;
- 6) Renee is personally making profit from loan sharking; and,
- 7) Renee is untrustworthy.

The Third image is of Lisa Purchase with a caption, "Delayed and stalled mortgage closure to force client into the need to borrow from Renee Dadswell"

- 1) Lisa is part of a conspiracy;
- 2) Lisa supports loan sharking;
- 3) Lisa supports defrauding seniors;
- 4) Lisa supports defrauding veterans;
- 5) Lisa is engaged in criminal activities;
- 6) Lisa is untrustworthy;
- 7) Lisa forces people to take personal loan from Renee; and,
- 8) Renee is personally offering loan at an illegal interest rate/

B) Anonymous Promoter Video - Youtube – posted November 21, 2023 ([Link](#))

Full title "Anonymous Promoter Now Helping Us to Warn Vulnerable Seniors About Verico the Mortgage Station"

S. 1(1) [Libel and Slander Act](#) define "broadcasting" to include "writing, signs, signals, pictures and sounds of all kinds". Your posted videos include images and sounds that are designed to generate negative associations with the images and sounds.

Your posted video titled "Anonymous Promoter" defame the Station and/or Station Brokers related to the time stamp referred to below:

0:06 – "Help us to warn vulnerable Seniors"

- 0:10 - "The Mortgage Station – House of Lies"
- 0:11 - "The Loan Sharks of Lefroy are now famous or infamous"
- "about how the crime was committed by the brokers of Verico the Mortgage Station in Lefroy"
- 0:19 - "South Simcoe Police – Omitting and Falsifying Evidence of Loan Sharking"
- 0:21 - Background image of grandparents with child with the Mortgage Station logo
- Foreground image of senior giving viewers the finger.
 - "Loansharks at Verico the Mortgage Station are shaking down seniors and the "Reverse Mortgage" HomeEquity Bank is acting like an accomplice."
 - A new documentary is exposing loansharking and fraud at an Ontario brokerage focused on targeting seniors."
- 1:02 - "Shaking Down Seniors in Innisfil... fraud and usur, also known as loan sharking..."
- "HomeEquity enlists a con man to protect seniors... Aug. 26, 2020 – According to research the bank conducted with Ipsos, 91% of Canadians over 55 believe they are more vulnerable to fraud..."
- 1:15 - Image of foreclosure and two seniors with their heads in their hands
- 1:43 - Image of HomeEquity Bank with a FRAUD stamped across it
- Image of list with words "HomeEquity Bank", "Reverse", "Mortgage", "cases of Fraud"
 - Image of "Scam", "Rip-off" and "fraud"
- 2:00 - Image of :Home Equity Bank, Scam, rip-off, fraud
- 2:19 - Image of masked person secretly watching over the shoulder of a senior on his computer.
- 2:22 - Image of two senior who look stressed with sharks swimming by and the Mortgage Station sign.
- 2:32 - two images of seniors looking stressed then a image of a board room with a team of people working with audio talking about the Station committing crimes.

The video continues for another 8 minutes with repeated statements and images designed to defame the Station and the Station brokers.

The normal and common understanding of these statements and images would be that the Station and Station Brokers are:

- 1) Conspiring in an ongoing criminal con against average people;

- 2) Conspiring in an ongoing criminal con against seniors;
- 3) That seniors have been conned out of their homes;
- 4) Engaged in a criminal coverup with Police;
- 5) Engaged in an ongoing loansharking scheme;
- 6) Engaged in an ongoing illegal coverup with the public;
- 7) Engaged in an ongoing criminal conspiracy with multi-billion dollar banks;
- 8) Engaged in a provincial wide scheme, nation wide scheme and part of an international scheme against seniors;
- 9) That the Station Brokers have engaged in criminal activities;

Conclusion:

All of the above published statements by you on the various websites constitute defamation. Every person who has helped you create the videos, images or posts are liable for the defamation that you have posted. There are numerous posts that repeat the above defamation or similar defamatory statements.

Any claim against you and/or your agents will cover all posts over the past year.

You have until January 5, 2024, to remove the defamatory statements and to post a retraction. In addition, given the repeated nature of your defamatory statements and effort you have made to contract third parties, you are required to contact each third party and retract your statements. Finally, you are required to publish a statement from the Station and from Station Brokers.

These are the minimum steps you are required to take in order to mitigate the damages you have caused.

Failure to comply will result in a claim against you and all your agents who have been a party to the defamation. Furthermore, we will seek an injunction to ensure you comply.

Final Appeal:

We had hoped your personal issues would not have turned into a vendetta against us. You have become obsessed with this and taken a minor mistake and created a major conspiracy based solely on your false belief that millions are being made from some con scheme.

In your world, no human can make any errors unless they are engaged in a major conspiracy. It was simply human error on paperwork that has standard fees and interest rates in an unusual situation where the Station uncommonly provided a short term loan.

Your money was refunded immediately when the error was detected, and you are out no money due to the error. However, you cannot accept human error.

You call yourself a journalist. Clearly you will be able to show the court that a journalist commonly creates false website (themortgagestation.tv) in order to mislead the public into going to your webpage when they are looking for us. If we were like you we would be posting everywhere that you are guilty of identity theft and fraud as you try to mislead the public.

Our system allows people to complain – you have done this. However, instead of accepting the results you further allege a growing conspiracy that includes police, politicians, regulatory authorities, etc.

Do you honestly think any court is going to accept your actions are normal or journalistic?

We accept that in our society people like to be seen as a victim – it helps their public image. You have created your own victimhood. You are out no money, but you sound like you have been repeatedly abused and bankrupted in the process.

If you are unwilling to look past your own personal vendetta, then at least consider those who have helped you – do they really need to answer for their actions in court?

The Mortgage Station

Mortgage Brokers