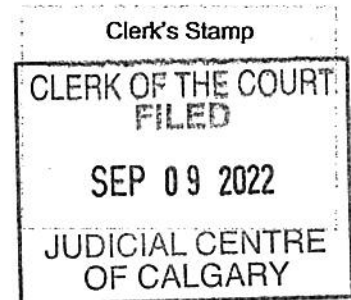


COURT FILE NUMBER 2201- 10256  
COURT COURT OF QUEEN'S BENCH OF ALBERTA  
JUDICIAL CENTRE CALGARY  
PLAINTIFF CRAIG CHANDLER and PROGRESSIVE GROUP FOR INDEPENDENT BUSINESS Inc.  
DEFENDANT CASSANDRA RAUGUST, DUANE BRATT, and MOUNT ROYAL UNIVERSITY  
DOCUMENT STATEMENT OF CLAIM  
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT Craig Chandler / PGIB  
Box 44068 Southcentre RPO  
Calgary, AB T2J 7C5



#### NOTICE TO DEFENDANT

You are being sued. You are a defendant.

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

**Note: State below only facts and not evidence (Rule 13.6)**

#### Statement of facts relied on:

##### The Parties

1. The Plaintiff, CRAIG CHANDLER & Emma MacKenzie who are individuals resident in the City of Calgary, in the Province of Alberta.
2. The Plaintiff, PROGRESSIVE GROUP FOR INDEPENDENT BUSINESS INC. ("PGIB") is a corporation registered pursuant to the *Business Corporations Act* (Alberta). At all material times hereto, the Plaintiff, CRAIG CHANDLER has been the CEO / Executive Director of the PGIB.
3. The Defendant, CASSANDRA RAUGUST is an individual resident in the City of Calgary, in the Province of Alberta.

4. The Defendant, DUANE BRATT is an individual resident in the City of Calgary, in the Province of Alberta.
5. The Defendant, MOUNT ROYAL UNIVERSITY is an academic institution headquartered in the City of Calgary, in the Province of Alberta that at all material times hereto has employed the Defendant, DUANE BRATT.

#### Overview

6. This is a Statement of Claim for defamation.
7. The Plaintiffs, CRAIG CHANDLER and the PGIB bring this action against the Defendants, CASSANDRA RAUGUST, DUANE BRATT, and MOUNT ROYAL UNIVERSITY for defamatory comments and false, irresponsible, unfair, and malicious attack his reputation. As set out further below, the Defendants falsely and maliciously suggests to the public, among other things, that the Plaintiffs have each or collectively engaged in malicious and harassing telephone calls. These false and malicious allegations have caused serious damage to the Plaintiff's personal and professional reputation.

#### The Defamatory Statements

8. On or about August 22, 2022, the Defendant, CASSANDRA RAUGUST stated on her twitter account through her username @ThisIsMeCassie:

I don't deny I am making assumptions in regards to Craig Chandler, however this is the playbook and nothing we haven't seen before in other forms.

I am completely assuming as well but through researching the phone numbers they lead back to osteria which is Craig Chandler's good buddies and Craig Chandler runs Daniels [sic] call centre

i don't know why they are happening either or why they lead back to Craig Chandler who runs the call center

it wouldn't surprise me – BUT this all leads to Craig Chandler who is Notorious for this sort of behaviour

it really is messed up and Danielle is aware of the disaster Craig Chandler is (manages her call campaign ) and let's [sic] him loose on us – she is not with our best interests at (heart icon)

it 100 is tied to craig chandler who runs the smith call centre campaign

9. On or about August 22, 2022, the Defendant, DUANE BRATT (acting in his capacity as an employee of the Defendant, MOUNT ROYAL UNIVERSITY) stated as follows:

Bratt agrees this fits Chandler's track record of being involved in politics and doing some not really up front activities. We don't know if Chandler was involved in this. We don't know if the Smith campaign was. But there's enough that smells here that points you in that direction. don't know if the Smith campaign was. But there's enough that smells here that points you in

that direction. See also <https://edmonton.citynews.ca/2022/08/23/danielle-smith-fake-prank-political-calls/>

10. On or about August 23, 2022, the Defendant, CASSANDRA RAUGUST stated on her twitter account through her username @ThisIsMcCassie:

I am pissed off I am pissed off that people like oh it's just ap rank this little girls just a snowflake Daniel [sic] Smith wouldn't do that **Craig Chandler is running her call-center of course it was done by them** (Emphasis added).

11. On or about August 26, 2022, the Defendants, CASSANDRA RAUGUST and DUANE BRATT both spoke to the media, causing reports in CityNews stating that "Craig Chandler [may] have some role in these call [sic].

(paragraphs 8 through 11 being collectively hereinafter referenced as the "Defamatory Statements").

12. At all material times hereto, the Defendant, DUANE BRATT has been employed by the Defendant, MOUNT ROYAL UNIVERSITY and speaks on its behalf. The Defendant, MOUNT ROYAL UNIVERSITY is therefore liable for any and all of the Defamatory Statements made by the Defendant, DUANE BRATT.
13. In the context of the Defamatory Statements as a whole or individually, the words convey the natural and ordinary inferential meanings concerning each of the Plaintiffs, CRAIG CHANDLER and the PGIB, to the average, ordinary person as a matter of impression that the Plaintiffs are engaged in illegal and/or unethical political tactics including harassing phone calls, with the Plaintiffs deny. The Plaintiffs, CRIAG CHANDLER and PGIB categorically deny involvement in any of the aforementioned activities.
14. At no time have any of the Defendants , published a formal retraction or apology for her false, malicious, and defamatory publication of the Defamatory Statements and serious damage to the Plaintiffs, CRAIG CHANDLER and the PGIB that arose from it.
15. The Defamatory Statements are, in their entirety and in their context, false and defamatory of the Plaintiffs, CRAIG CHANDLER and the PGIB.
16. The Defamatory Statements attack the Plaintiffs', CRAIG CHANDLER and PGIB's morals, good standing, honesty, integrity, cast suspicion on their character and falsely and maliciously lead people in the community to believe that they are predators and dangerous individuals.
17. The Defendants, CASSANDRA RAUGUST and DUANE BRATT published the Defamatory Statements unfairly, irresponsibly, and with express malice, intending or knowing that the Defamatory Statements and the innuendo arising from them are false and

defamatory or with careless and reckless disregard for their truth, and in utter disregard of the consequences of the publications, and their publications were calculated by the defendant to disparage and injure the reputations of the Plaintiffs, CRAIG CHANDLER and DUANE BRATT.

18. As a result of the publication of the Defamatory Statements, the Plaintiffs, CRAIG CHANDLER and DUANE BRATT has been and continues to be subjected to ridicule, hatred, odium, and contempt and have suffered and continue to suffer damages to their reputation.
19. As a further result of the publication of the Defamatory Statements, and all repetitions and republications of them, and the malicious, unfair, and irresponsible conduct of the Defendants, CASSANDRA RAUGUST and DUANE BRATT, the Plaintiffs, CRAIG CHANDLER and the PGIB have each been injured in their feelings, in their personal and professional character and reputations. The Plaintiff also continues to suffer from hurt, humiliation, and embarrassment as a result of the publication of the Defamatory Statements and the conduct of the said Defendants.
20. The Defamatory Statements have caused and will continue to cause serious personal and professional damage to the Plaintiffs, CRAIG CHANDLER and the PGIB.
21. As a result of the foregoing, the Plaintiffs, CRAIG CHANDLER and the PGIB have each suffered and will continue to suffer damages for which the Defendants, CASSANDRA RAUGUST, DUANE BRATT, and MOUNT ROYAL UNIVERSITY are each liable. In that regard, each of the Defendants have and continues to have an enormous capacity to inflict reputational damage online to the Plaintiffs.
22. By their conduct, the Defendants, CASSANDRA RAUGUST and DUANE BRATT have further aggravated the damages caused by them to each of the Plaintiffs, CRAIG CHANDLER and the PGIB, which includes in particular, but without limitation, the following:
  - a. The Defendants posted a one-sided, sensational account of untrue events conveying false and defamatory claims of illegal conduct, and knowingly misstating information to the public concerning the conduct of each of the Plaintiffs;
  - b. The Defendants each have conjured and manipulated facts and set out to destroy and discredit the reputation of each of the Plaintiffs;
  - c. At all times, the Defendants have each been unfair, irresponsible, and motivated by malice towards each of the Plaintiffs. The Defendants each failed to exercise any diligence whatsoever in checking the facts behind their her allegations that the Plaintiffs is, among other things, dangerous and guilty of illegal and/or improper acts;
  - d. Given the seriousness of the allegations against each of the Plaintiffs, including allegations of illegal conduct, the Defendants each had an obligation and a duty,

which she failed to fulfill, to diligently and thoroughly research, investigate and scrutinize the allegations against each of the Plaintiffs, in order to verify the truth.

23. The Plaintiffs, CRAIG CHANDLER and the PGIB each state that the Defendants, CASSANDRA RAUGUST and the PGIB made the Defamatory Statements with calculated intent for collateral purpose, namely, to discredit the Plaintiffs and their clients, cost them business, and bring them into public ridicule, odium, and contempt, and marginalize them for personal gain by the Defendants, all of which to be proven at the trial of this action.
24. The conduct of the Defendants, CASSANDRA RAUGUST and DURANE BRATT which demonstrate malice, high-handedness, and arrogance, warrants an award of punitive, aggravated, and exemplary damages to reflect the exceptional harm done to the Plaintiffs, CRAIG CHANDLER and the PGIB and to ensure that the Defendants are appropriately sanctioned for her conduct and that she and others are deterred from such conduct in the future.
25. The Plaintiffs, CRAIG CHANDLER and the PGIB reserve the right to amend the pleadings should further particulars be established by way of any further videos or publications of any kind be release by any of the Defendants.
26. The Plaintiffs, CRAIG CHANDLER and the PGIB pleads and relies upon the *Defamation Act* (Alberta) and *Judgment Interest Act* (Alberta) and other statutes and regulations to be referenced at the trial of this action.

#### Remedy Sought

27. The Plaintiffs, CRAIG CHANDLER and the PGIB each claims against the Defendants, CASSANDRA RAUGUST, DUANE BRATT, and MOUNT ROYAL UNIVERSITY, as follows:
  - a. A declaration that the Defamatory Statements constitute defamation pursuant to the *Defamation Act* (Alberta) and at common law;
  - b. An interlocutory and permanent injunction restraining the Defendant from any and all further publication of the Defamatory Statements or similar statements;
  - c. General damages in the amount of \$100,000.00;
  - d. Special damages in an amount to be proven at the trial of this action;
  - e. Damages for loss of income and loss of opportunity to be proven at the trial of this action;
  - f. Aggravated, punitive, and exemplary damages in the amount of \$25,000.00;
  - g. A tracing of any and all electronic data evidencing the conduct of the Defendant, whether it be in her hands or that of an unrelated third party estranged from this action;
  - h. Costs on a solicitor-client (full indemnity) basis;
  - i. Judgment interest pursuant to the *Judgment Interest Act*; and

- j. Such further and other relief as this Court deems just and proper.

**NOTICE TO THE DEFENDANT(S)**

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

20 days if you are served in Alberta

1 month if you are served outside Alberta but in Canada

2 months if you are served outside Canada.

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

**WARNING**

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