

recruit, on false pretences, other tenants into fabricating complaints against the BMNPHC and/or the SCHC.

19. The Defendant acknowledges letters were delivered to tenants. However, the Defendant denies attempting to unite or recruit, on false pretences, other tenants into fabricating complaints as the Defendant doesn't lie. The Defendant further contends that the purpose of these letters were to inform tenants of the Plaintiff's criminal wrongdoing. It is the Defendant's position that these letters did not ask other tenants to take actions. The Defendant contends these letters were informative in nature, including the act of informing tenants of a private Facebook group they can join if they'd like to witness and/or participate in conversations about the BMNPHC and SCHC's thefts, illegal evictions, breach of contract, breach of privacy, and other criminal wrongdoing. Furthermore, the Defendant requests the Plaintiff to point-out which statement(s) in this letter are attempts to incite or recruit, on false pretences, other tenants into fabricating complaints against either the BMNPHC or the SCHC, or anyone else at all.

20. The Plaintiff demands the Defendant remove defamatory posts relating to the BMNPHC and/or the SCHC, as well as cease further defamatory statements, as well as a public retraction and apology.

21. The Defendant denies making defamatory posts about the Plaintiff. The Defendant will absolutely not stop making true public posts and statements about the Plaintiff's