

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

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Roy Den Hollander,

Plaintiff,

-against-

Tory Shepherd, Political Editor of The Advertiser-
Sunday Mail Messenger;
Advertiser Newspapers Pty Ltd., d/b/a The Advertiser-
Sunday Mail Messenger;
Amy McNeilage, Education Reporter for The Sydney
Morning Herald;
Fairfax Media Publications Pty Ltd., d/b/a The Sydney
Morning Herald;

Defendants.

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Index No. 152656/2014

**FIRST AMENDED
VERIFIED COMPLAINT**

Jury Requested

This First Amended Complaint is submitted pursuant to CPLR 3025(a).

Plaintiff by and through his attorney, Roy Den Hollander, complains of all the
Defendants: Injurious Falsehoods, Tortious Interference with a Prospective Contractual
Relation, and, in the alternative, *Prima Facie* tort.

Plaintiff also complains of Defendant Tory Shepherd: Libel.

Plaintiff requests that Tory Shepherd publicly retract her libelous statements listed in this
First Amended Complaint.

A clarification of terms is initially needed. Plaintiff in his writings, speeches and
interviews uses the term “feminist” to mean a person, usually female but not necessarily so, who
believes that an accident of nature, being born female, made her superior to men in all matters
under the sun. One who believes men are guilty until they prove themselves innocent, and that
females are innocent until proven guilty, but even then a guy is still blamed for what the female
volitionally did. Another definition Plaintiff relies on is that used by “Women Against

Feminism” that real-life feminism has come to mean the “vilification of men, support for female privilege, and a demeaning view of women as victims rather than free agents.” (Ex. A). So when Plaintiff uses the term “anti-feminist,” he’s referring to the preceding definitions.

Attorney Bolger and Defendants use the term “anti-feminist” to mean anti-female or hater of women. In effect, they are equating “feminist” with woman or female even though all females would not classify themselves as feminists. To avoid confusion, Plaintiff will add the descriptors “hardcore, extreme or man-hating” to the term feminist in order to communicate his definition of feminist.

Introduction

1. Two modern-day, book-burning, bacchae reporters from down-under (Australia) created an unnecessary controversy by authoring and publishing false and misleading information concerning Plaintiff’s copyrighted property and himself with the intent and result of harming his interests that have pecuniary value and interfering with a prospective economic advantage by causing the University of South Australia (“University”) to incinerate a section of a Male Studies course that Plaintiff (“Roy”) was going to teach via the Internet from New York City.

2. The section was created by Roy in New York City, was officially titled “Males and the Law” and was a copyrighted compilation of the law from the industrial revolution to the present on how the law discriminated against men and women.

3. The two reporters who are biased against men’s rights advocates: Tory Shepherd, a.k.a. “Tory the Torch,” or “The Shepherd of Lies,” for The Advertiser-Sunday Mail Messenger and Amy McNeilage, a.k.a. “Amy McNeuter,” for The Sydney Morning Herald, published a total of five articles targeted to their Worldwide Internet and print audience with a combined readership

of 7,330,000—1,750,000 for The Advertiser-Sunday Mail Messenger and 5,580,000 for The Sydney Morning Herald.

4. The articles were published in print and online through the reporters' respective employers' interactive websites that knowingly reach New York State readers via the World Wide Web.

5. Through the Advertiser Newspapers Pty Ltd. ("Advertiser") and Fairfax Media Publications Pty Ltd. ("Fairfax") websites and printed newspapers, these two hardcore, extreme feminist reporters used their power of the media to do what weak-minded ideologues have done throughout history—employ disparaging comments about the works of others and personal attacks to successfully prevent the spread of knowledge and ideas that they disagreed with.

6. For Tory Shepherd ("Tory") and Amy McNeilage ("Amy"), the right of students at the University to learn about and discuss issues of public concern takes the back seat to what these reporters decree can be discussed.

7. Tory and Amy conducted a high-tech book-burning without even determining the content of the online Male Studies courses that they self-righteously proclaimed "extreme" and "radical" because its creators were men's rights activists, a group against which they invidiously discriminate in their reporting.

8. The older, alpha, man-hating feminist reporter, Tory, actually refers to men's rights activists as "MREs"—"Men's Rights Extremists." (Tory Shepherd, *Men's rights extremists go online*, The Advertiser-Sunday Mail Messenger, January 10, 2012, Ex. B).

9. In writing their initial articles on the Male Studies courses and its creators: Tory Shepherd's, *LECTURERS in a 'world-first' male studies course at the University of South Australia under scrutiny*, The Advertiser-Sunday Mail Messenger, January 12, 2014, Ex. C; and

Amy McNeilage's *University of South Australia distances itself from males studies proposals*, The Sydney Morning Herald, January 14, 2014, Ex. D, these notorious feminist bigots set out with the intent to use false statements and false factual connotations that disparaged the courses' creators and their content so as to prevent the courses from being taught at the University and the creators/teachers from receiving a fee for their efforts.

10. Tory and Amy's strategy followed the maxim that if you don't like the message, disparage it and verbally kill the messenger before he has a chance to deliver it. The politically correct justify this tactic under the false belief that the "personal is political"—it is not, it is private.

11. Tory and Amy intentionally misled their readers, including the University, that the courses' creators, including Roy, were going to present "extreme views" on men's rights (Ex. C), were unfit for teaching because they allegedly "rail" against feminism (Ex. C), were "hardline anti-feminist advocates" (Ex. D) and were "controversial Americans" (Ex. D) because they were offering an academic discipline that did not embrace man-hating feminism as a theoretical paradigm.

12. What Tory and Amy do not comprehend is that the rights of one sex do not conflict with the rights of the other and "extremism" only occurs when one sex is given preferential treatment over the other. Something Tory and Amy have enjoyed their entire lives.

13. If these two hardcore, left-wing feminist book-burners had not jumped on their broomsticks and scared the bejesus out of the administrators at the University and effectively intimidated them with the threat of further calumny from their newspapers, the University's students would have had an opportunity to acquire knowledge and consider views not available anywhere else in higher education. In addition, Roy would have received a fee for teaching his

“Males and the Law” section, and the value of his copyrighted work would not have been diminished.

14. In the 1950s, Senator Joseph McCarthy and Roy Cohn also used opprobrious and unsubstantiated accusations in order to shut down dissent and political criticism—as did the witch hunters of yesteryear, only today it is the witches who are doing the hunting with pogroms against non-conformists who do not genuflect to the dogma of extreme feminism and hardcore political correctionalism, which imprisons thought, speech and liberty.

15. In their day, McCarthy and Cohn even attacked the overseas library program of the U.S. State Department, which was meant as an educational resource for supporting lady liberty. Card catalogs were searched for works by authors whom McCarthy and Cohn deemed “inappropriate.” The State Department ordered its overseas librarians to remove from their shelves “material by any controversial persons, communists, fellow travelers, etc.” Griffith, Robert, *The Politics of Fear: Joseph R. McCarthy and the Senate*, p. 216, University of Massachusetts Press. Some libraries actually burned the newly forbidden books and works.

16. Tory and Amy have continued in the McCarthy-Cohn tradition by destroying courses at a public university, the contents and teachers of which they deemed “controversial” in order to crush dissent, expand the power of their positions and maintain their feelings of superiority.

17. They did not report the news, but vented their personal animosities against men’s rights advocates because such men do not view the world through the myopic lens of hardcore, man-hating feminism.

18. Tory and Amy “use of the big lie and the unfounded accusation against any citizen in the name of security [hardcore feminism]. It is the rise to power of the demagogue who lives on

untruth; it is the spreading of fear and the destruction of [liberty] in every level of society.”

President Harry Truman.

19. In the 1950s, newsletters such as *Counterattack* and *Confidential Information* were published to keep track of communist and leftist organizations, their publications and members. Today in Australia, it is Tory at The Advertiser-Sunday Mail Messenger and Amy at The Sydney Morning Herald who help other intolerant hardcore feminists keep track of so-called “anti-feminists,” “hardliners,” and “extreme right wing groups” that dare present viewpoints and facts contrary to hardcore feminist and politically correct ideology.

20. People like Tory and Amy, as with McCarthy and Cohn, just don’t understand that “In a free country, we punish men for the crimes they commit, but never for the opinions they have.” President Harry Truman. Tory, Amy and their fellow-travelers have recently made a mockery of that statement for higher education in Australia.

Parties

21. Plaintiff Roy Den Hollander is a resident of New York County, New York, a former card-carrying member of Students for a Democratic Society (“SDS”), former Riverside Democratic club officer, former New Democratic Coalition delegate, former Democratic County Committeeman from the Upper Westside, former legislative aide to the late State Senator for Haarlem, Sydney von Luther, former television news writer and political producer and an attorney who has practiced law for nearly 30 years and is admitted to practice in New York State, the U.S. Southern and Eastern District Courts of New York, the U.S. Court of Appeals for the Second Circuit and the U.S. Supreme Court.

22. Defendant Tory Shepherd is the Political Editor for the print and online newspaper The Advertiser-Sunday Mail Messenger, headquartered at 31 Waymouth Street, Adelaide, South

Australia 5000, Australia and, on information and belief, a resident of the State of South Australia.

23. Defendant Advertiser Newspapers Pty Ltd. (“Advertiser”) is a registered Australian company, ACN 007872997, located in Adelaide, Australia, which does business under the name of The Advertiser-Sunday Mail Messenger. Service of documents on Advertiser go to Sir Keith Murdoch, 31 Waymouth Street, Adelaide, South Australia 5000, Australia. Advertiser is a subsidiary of Rupert Murdoch’s News Corporation, which is headquartered in New York City.

24. Defendant Amy McNeilage is the Education Reporter for The Sydney Morning Herald headquartered at Fairfax Media, 1 Darling Island Road, Pyrmont NSW 2009, Australia and, on information and belief, a resident of the State of New South Wales, Australia.

25. The Sydney Morning Herald is part of Fairfax Media Publications Pty Ltd. (“Fairfax”), which is a registered Australian company, ACN 003357720, located at 1 Darling Island Road, Pyrmont NSW 2009, Australia.

Personal Jurisdiction

26. Every day of the year, both The Advertiser-Sunday Mail Messenger and The Sydney Morning Herald offer/sell their newspapers through the Internet and agents to residents of New York State, which amounts to transacting business in New York under CPLR 302(a)(1).

27. The “Australian Community” is a New York non-profit organization that has about 20,000 members whose mission is to connect Australians living in New York through social, professional and charitable initiatives. (Ex. N, <http://www.aucommunity.org/>). Many of its members in New York subscribe electronically to The Advertiser-Sunday Mail Messenger and The Sydney Morning Herald, which often provide articles pertinent to this community in New York.

28. The Advertiser-Sunday Mail Messenger and The Sydney Morning Herald websites offer for sale, sell, and deliver various goods and services through their websites that also allow the transmittal of information between Defendants and their readers, between their readers and between other companies and their readers.

29. The Advertiser-Sunday Mail Messenger online “provides its audience with the opportunity to become involved and be engaged on issues and stories, through debate and social media.”

30. The Sydney Morning Herald online provides “access to exclusive discounts, events and competitions, unlimited access to our award-winning tablet apps, interactive quizzes, crosswords, Sudoku free in the iPad app.” Both are highly interactive websites that qualify as transacting business in New York. *See Citigroup Inc. v. City Holding Co.*, 97 F.Supp.2d 549, 564-66 (S.D.N.Y. 2000).

31. News Corp is headquartered in New York City and identifies itself with News Corp Australia under the caption “Who We Are.” (Ex. M). Since News Corp Australia owns all of Advertiser, News Corp’s identity includes Advertiser, so Advertiser is present in New York.

32. The causes of action arise from the Defendants publications of their articles online, and, in the case of Fairfax also print newspapers, which are all part of Defendants transacting business in New York under CPLR 302(a)(1). *See Johnson v. Ward*, 4 N.Y.3d 516, 519 (2005).

33. The Defendants committed tortious acts without the state causing economic injury to a resident within the state while persistently conducting business in New York and soliciting subscribers. CPLR 302(a)(3). Persons committing tortious acts using the Internet should expect to be within the personal jurisdiction of a state at which the tortious acts were directed.

34. In addition, Tory contacted Roy at his email address and subsequently telephoned him at his New York County telephone number to interview Roy for her second article. She also contacted another lecturer in the Male Studies courses in New York, Professor Miles Groth.

Facts

Tory Shepherd's culpable conduct

35. The psychological-bacchanalian frenzy of the two zealot reporters (they believe there are two sides to every story: the extreme feminist side and the intemperate politically correct side) began when Tory, on or about January 9, 2014, contacted Dr. Gary Misan at the University, asking about the Male Studies courses, and claimed that Roy, the creator and slated teacher for the "Males and the Law" section of one course, had been "identified as belonging to extreme right wing groups in the USA."

36. Roy used to play right wing forward for a few rugby teams, perhaps that was what Tory meant; otherwise, it was totally false.

37. Tory's questioning of Dr. Misan and her subsequent articles show that she knew the University was offering the Male Studies courses and that Roy was to teach a section of one.

38. Shepherd's January 12, 2014, article in The Advertiser-Sunday Mail Messenger was headlined *LECTURERS in a 'world-first' male studies course at the University of South Australia under scrutiny* (Ex. C). In her January 14, 2014, article, she wrote "[a]n information sheet on the male studies course stating that it would be considered 'if there is sufficient interest,'" meaning if enough students registered for the course. (Ex. E, Tory Shepherd, *University of South Australia gives controversial Male Studies course the snip*, The Advertiser-Sunday Mail Messenger, January, 14, 2014).

39. Prior to Tory's January 12, 2014, article (Ex. C), the Male Studies courses were open for registration, which meant the University wanted to see what the enrollment numbers were in order to determine whether the courses would be profitable.

40. Roy had developed a three-week section for one of the courses that was based on the quote by Sir William Blackstone from 1765, "So great a favorite is the female sex of the laws."

41. The theme of Roy's section, which would have included three online lectures, assignments and online class discussions from New York, was that since the industrial revolution (1760-1830), common law countries, such as the U.S., England and Australia, had established legal systems that discriminated against men largely to their detriment while discriminating against females mainly to their benefit.

42. Roy and representatives for the University had already reached an agreement on compensation and content of the "Males and the Law" section in which he would be paid a maximum of \$1250 depending on the hours involved.

43. On the morning of January 10, 2014, Roy read an email from Tory requesting his telephone number because as she said, "I'm trying to get in touch for a story I'm doing on the UniSA [University of South Australia] course you're involved with" By her words, the story was to be about the course and Roy's involvement.

44. Roy emailed her his number at 7:40 AM that same morning of January 10th.

45. On January 12, 2014, Tory published an article in The Advertiser-Sunday Mail Messenger without having ever interviewed Roy, apparently to avoid the truth about what he would teach. (Ex. C, Tory Shepherd, *LECTURERS in a 'world-first' male studies course at the University of South Australia under scrutiny*, The Advertiser-Sunday Mail Messenger, January 12, 2014).

46. That seemed strange. Roy had in the past worked as a writer, political producer and researcher for Metromedia News, now Fox 5 News, and Channel 7 Eyewitness News in New York City, but he could not recall anyone ever publishing or airing a story and then interviewing one of the subjects of the story afterward, which is exactly what Tory did. Perhaps Tory has a Dr. Who view of time, or that's the way the media works in an erstwhile penal colony.

47. Tory's failure to interview Roy to determine what he was going to teach in the "Males and the Law" section indicates that she was not motivated by the quality of the education offered at the University but rather by an intent to defame and disparage Roy, a men's rights activist, and the section he would teach in her effort to abort it by publishing false and misleading information.

48. If Roy had not been a men's rights advocate, Tory, like any bush league reporter, would have first determined what he was going to teach before publishing an article concerning a course at a university.

49. The clear purpose of her January 12th news article (Ex. C) was to disparage the Male Studies courses, denigrate the teachers, defame their reputations and ultimately deep-six the Male Studies courses.

50. Her secondary headline for the January 12th article stated: "Lecturers . . . linked to extreme views on men's rights and websites that rail against feminism." That statement communicated that the content of the courses and the section Roy was to teach inveigh against the rights of women. It also defames the course's lecturers of whom Roy was one.

51. Tory also wrote in that article, "The course, which has no prerequisites, begins this year and will canvass subjects from men's health to gender bias." The lack of prerequisites was her way of communicating the courses and their sections lacked academic rigor.

52. Tory's malice toward men's rights activists is not a one-night stand. She has figuratively picked up Lizzie Borden's hatch and set off whacking any men's rights activist, whom she invariably calls MREs (Men's Rights Extremists), that comes to her attention.

53. For example in her news article *Men's rights extremists go online*," The Advertiser-Sunday Mail Messenger, January 10, 2012 (Ex. B), she wrote:

THERE'S a movement that sees males - generally straight, middle-aged, white males - as the new oppressed. Seriously.

They [MREs] have a persecution complex, and aggressively lobby for better rights for men - usually at the expense of women.

[Their] false claims are not just sinister ideas confined to the interwebs - they're calls to action. Men's Rights Extremists are actively lobbying to change Australian laws. They are spreading misinformation and trying to discredit good policies and good programs.

The MREs . . . Dr Flood says . . . have already influenced family law, government policy and community attitudes, subtly shifting the balance to better protect perpetrators and discredit victims.

They provide a heady, toxic mix of bitter, self-righteous fury. . . . [T]o come together and foment trouble.

54. Tory's dedicated purpose in life appears to be cultivating a public hatred toward men's rights advocates, or perhaps she's just a congenital "Hater of Men" ("HOM").

55. Tory did quote from both sides in her January 12, 2014, article, but in order to diminish the value of the quotes from the men's rights advocates involved in the courses, she first painted two of the lectures in a negative light by crafting a misleading impression of them so as to mold the reader's reaction right at the beginning of her story into one opposing the courses and viewing the lectures as disreputable:

Two lecturers [which included Roy] have been published by prominent US anti-Feminist site A Voice for Men, a site which regularly refers to women as "bitches" and "whores" and has been described as a hate site by the civil rights organisation Southern Poverty Law Centre. (Ex. C).

56. After various other false connotations exploiting her dissembling and prevaricating methods of attacking the courses and their creators, Tory quoted from those whom she had used in the past to support her anti-men's rights articles, and those so-called experts she depicted as pillars of PC left-thinking society:

Dr Michael Flood, from the University of Wollongong's Centre for Research on Men and Masculinity, said these types of male studies "really represents the margins". "It comes out of a backlash to feminism and Feminist scholarship. The new male studies is an effort to legitimise, to give academic authority, to anti-Feminist perspectives."

Flinders University School of Education senior lecturer Ben Wadham, who has a specific interest in men's rights, said there was a big difference between formal masculinity studies and "populist" male studies. He said there were groups that legitimately help men, and then the more extreme activists. "That tends to manifest in a more hostile movement which is about 'women have had their turn, feminism's gone too far, men are now the victims, white men are now disempowered'," he said. "I would argue that the kinds of masculinities which these populist movements represent are anathema to the vision of an equal and fair gendered world." Dr. Wadham said that universities needed to uphold research based traditions instead of the populist, partisan approach driven by some. (Ex. C).

57. Tory's disparagement of the courses, which included the "Males and the Law" section, occurred not only without her interviewing Roy for her first article, but with her being totally ignorant of what Roy was going to teach. Obviously, when it comes to men's rights activists, she follows the adage "don't let ignorance or tolerance get in the way of a story" that furthers her personal beliefs. Sounds like the three monkeys, or is it the three stooges? (Tory did do a quick 10 minute interview of Roy for her second article, but by then, as that article makes clear, she had accomplished her purpose of aborting six of the eight courses, including the one with Roy's section before it even had a chance at life.)

58. Had Tory followed the ethics of her profession and determined the content of the "Males and the Law" section before slinging her rabid-feminist mud, her readers, assuming she told

them the truth, would have had a completely different impression of that section—one that was based on the truth rather than her misleading statements masquerading as facts.

59. When dealing with yellow, female-dog-in-heat reporting such as that January 12, 2014, article, one has to understand what ideologically corrupt reporters like Tory are doing. They are not writing for the intellect of the average reader but for her gut. They write not to inform, not to enlighten, and not to elucidate, but to propagandize so as to churn the public's emotions against what others, who disagree with them, would say or in this case teach.

60. The false impression Tory intentionally created—with her chosen words, their arrangement, the out of context quotes she took from Roy's writings, prevarications and the selective quotes from others she knew agreed with her snake-oil ideology—was that Roy is evil and should figuratively, if not literally, have his tongue cut out to keep him from presenting his historical compilation of a legal issue on how the law treated the sexes.

61. Tory engaged in verbal mutilation of both the section and Roy in order to affect censorship.

62. In creating her spite filled tapestry of an “inappropriate” course section, this Harpy harped on the following descriptions of Roy in her January 12, 2014, article, and, by inference, the “Males and the Law” section he created and would teach: “extreme” right-winger, “anti-feminist,” associates with persons who use language Tory disapproves of, believes one remaining source of power in which men still have a near monopoly is the right to bear arms, calls women's studies “witches studies,” wants to eliminate the rights females have as humans, and believes females oppress men.

63. So is Tory's intended impression of the “Males and the Law” section and Roy correct, partially correct, politically correct, evolutionarily correct or some combination? Let's see.

64. In the 1960s, as an SDS activist engaging in civil disobedience against the Vietnam War, Roy was repeatedly accused of espousing communist doctrine. Today, Tory accuses him of propagating right-wing, extremist anti-female tenets and inferring such would undoubtedly be included in the “Males and the Law” section.

Roy “[has] been linked to extreme views on men’s rights and websites that rail against feminism.” (Ex. C).

65. Such words carry all the imagery of armed ISIS lunatics and suicide bombers, which was her intent.

66. Contrary to Tory’s false accusations, the political belief system espoused by Roy—based on the Declaration of Independence and the U.S. Constitution—has not changed since the 1960s, only the epithets that conformists use to scare others into agreeing with their self-righteous, self-serving, bigoted and hypocritical beliefs in order to censor views they disagree with.

67. Roy does describe himself as an anti-feminist because by his definition of feminism, he’s too intelligent not to be. He’s also anti-commie, anti-nazi, anti-bigot and anti-ignorance.

68. Tory, however, uses the term, “anti-feminist,” to depict Roy as an anti-female, modern-day pariah, but she not only never asked Roy what he meant by “feminist” or “feminism,” she failed to define what she meant by such. Was she referring to Mary Wollstonecraft’s brand described in *A Vindication of the Rights of Woman: with Strictures on Political and Moral Subjects* (1792); was she referring to First Wave, Second Wave, Third Wave or Run-For-The-Hills feminism? Readers of her articles have no way of knowing, but the tenor of the times to which the ignorant often blindly subscribe has “anti-feminist” connoting the same thing as “anti-female.”

69. Roy defines a feminist as a person who believes that an accident of nature, being born female, made her superior to men in all matters under the sun. One who believes men are guilty

until they prove themselves innocent, and that females are innocent until proven guilty, but even then a guy is still blamed for what the female did.

70. Another definition Roy relies on is that used by “Women Against Feminism” that real-life feminism has come to mean the “vilification of men, support for female privilege, and a demeaning view of women as victims rather than free agents.” Tory is definitely a feminist by both definitions—a hard-line, avid hater of men’s rights activists who is jealous of their accomplishments.

71. Tory used “anti-feminist” in her January 12, 2014, article as a disparaging term that communicated the “Males and the Law” section would be taught by “refer[ing] to women as ‘bitches’ and ‘whores,’” “rail against feminism [female rights],” and propagate “hate” toward 51% of the population. (Ex. C).

72. The falsity in her disparaging characterization is that the section is based on the history of the law. Since Roy was not around to write those laws, his views of the likes of Tory play no part in that history, unless Tory and her fellow man-hating travelers re-write history to give Roy a role he never had.

73. As for associating with persons who use language defined by Tory as “inappropriate,” Tory is not an American, although perhaps a descendant of unwelcome Britishers from Botany Bay, so it is somewhat understanding that she does not comprehend the right of association or speech guaranteed by the First Amendment to the U.S. Constitution.

74. Tory, like most PCers, use the word “inappropriate” to appropriate the free speech of others that upsets their subjective sensitivities, which often requires them to schedule an extra session with their therapists.

75. On information and belief, Tory must have uttered a disparaging word about men when going through the trouble of maintaining blonde hair at her age and plucking her eyebrows in a vain effort to remain attractive, or as she said on facebook “F**k yeah. All it takes is two inches of makeup and three hours of hairspray!”

76. In her January 12, 2014, article (Ex. C), Tory used her guilt-by-association and disparagement of speech she disagrees with to communicate that the “Males and the Law” section was part of a “right wing” conspiracy of groups with “extreme” views against females. Once again, the course section is simply a summary of the history of the law concerning the sexes, and, unless the Masons wrote all those laws, there is no right, nor left wing conspiracy at work—other than the one that Tory belongs to in demanding preferential treatment for her sex.

77. As for mainly men exercising their right to bear arms in the U.S.—it’s the truth, look at the statistics. More importantly, what Tory was really attacking as extreme was Roy advocating that men exercise their Second Amendment right. (Ex. C). So, how can the exercise of a right be extreme? It can’t.

78. The “Males and the Law” section did not even touch on the U.S. Constitution’s Second Amendment, but how could Tory have known that since she never reviewed the section’s contents. She simply saw it was going to be taught by one who was not a sycophant of the politically correct, so she created the false impression that Roy would advocate in his section using lefties and females for target practice.

79. The concept that Roy’s “out-of-context quote” was communicating is that the Second Amendment is crucial for preserving liberty. When a government effectively eliminates the rights that the members of a distinct group, such as men, are entitled to, the rights that are left, if any, are their remaining sources of power. The very reason for rights is to allow the individual

or individuals to exercise power against a government that treats them as less than human. For example, free speech is the power of the pen, the right of association is the power to organize, and the Second Amendment is to give people a fighting chance against unjust state violence, such as what occurred in 1776, 1848 Paris, 1956 Hungary, 1968 Czechoslovakia, 2011 Syria, 2014 Kiev and so on.

80. Thank goodness for Australians that Tory was not around for Australia's battle against the Japanese. Her anti-gun advocacy for men might have even resulted in her and Amy ending up as Japanese "comfort girls" or suffering the fate of Nanking, China.

81. The witchcraft label has been historically applied to practices people believe influence the mind, body or property of others against their will. Hard-line feminist linguistics, replete throughout Women's Studies programs, is an obvious effort to control thought, speech and action. As George Orwell wrote, "if thought corrupts language, language can also corrupt thought," *"Politics and the English Language,"* 1946, and once thought is corrupted, so is a person's beliefs, and corrupted beliefs are the real power for controlling people against what otherwise would be their free will and self interest. Hardline feminist Newspeak spreads by imitation, and like all ideologies, it is ready to relieve a person of having to think.

82. Tory's tactic with her "witches studies" reference, as with her other grabs for emotions via superficial out-of-context reporting, was meant to censor the historical research of a men's rights advocate that showed the law has generally treated females in a preferential fashion since the Industrial Revolution.

83. Tory simply exploited the modern-day stupidity that free speech is only allowed when it conforms to tenets Tory and the politically correct hold sacred. Those who do not conform must

be silenced, so the “Males and the Law” section was aborted. Then again, maybe she was afraid it would use the same linguistic tactics as Women’s Studies, making it “Warlock Studies.”

84. On eliminating the rights of females, every case brought by Roy sought equality of rights between the sexes. Each case would have eliminated preferential treatment of females. Tory criticizes the cases because for her equality means that “All animals are equal, but some animals are more equal than others.” George Orwell *Animal Farm*, last page.

85. For example, in the Ladies Nights’ case against New York City nightclubs, males have to pay \$20 or more just to enter a nightclub while females enter for free. Is that fair, especially when the average lady makes more on a per unit of time basis than the average guy—\$1.08 to \$1.00, when last I looked at the U.S. Bureau of Labor Statistics.¹ The average male makes more money over all, however, because he works longer hours.

86. Tory used her false representation of the cases to infer that the “Males and the Law” section and Roy would promote the derogation of rights for females. If anything, the section illustrated the importance that the laws act toward each sex with a blindfold so that the rights of both are protected.

87. On oppression by females, if she’s hot, she can walk all over Roy in her stiletto heels. (Tory actually quoted the last clause of this sentence from the Original Complaint as the secondary headline for a June 18, 2014, article (Ex. F), but in order to create a false impression of Roy as a lawyer, she left out the qualifier “Seriously, however,” which followed the quoted clause).

¹ Calculating this number requires using the U.S. Department of Labor, Bureau of Labor Statistics, *Time Use Survey 2007*, Table A-1.

88. Seriously, however, the Violence Against Women’s Act was written by the Feminist Majority and NOW’s Legal Defense Fund. Under a section of that Act, American men are targeted by allowing their alien wives or alien girlfriends to accuse them of some phony abuse. The Department of Homeland Security will then hold secret proceedings to determine whether the abuse occurred, but the one person barred from the proceeding is—you guessed it—the guy accused of the abuse. The only evidence the Department allows comes from the alien female, her lawyer and feminist consultant—both are usually paid for by the U.S. Government. That’s not the back of the bus—the man is not even allowed on the bus. He’s left at the station as the ultra-feminist VAWA Unit in Vermont runs over his career and reputation.

89. That section of the Act is nothing more than a corruption of the truth reached in a kangaroo administrative hearing under the abandonment of due process of law, which was primarily intended to harm men by the hard-line feminists who wrote it.

90. Now, to be fair, a word Tory should look up, American females can find themselves in a similar position, but the vast, vast majority are guys targeted by the ultra-feminists because they knew guys were the ones trying to escape them by going overseas for girlfriends and wives.

91. The purpose of Tory’s statement that Roy “argues that feminists [females] oppress men in today’s world” was to depict Roy as paranoid and the “Males and the Law” section as the ranting of a paranoid lawyer. (Ex. C, Tory Shepherd, *LECTURERS in a ‘world-first’ male studies course at the University of South Australia under scrutiny*, The Advertiser-Sunday Mail Messenger, January 12, 2014).

92. Tory didn’t bother to consider the truth or falsity of her statement because her purpose was to abort the “Males and the Law” section by scaring the University into believing that the section’s content was delusional because a paranoid had prepared it and would teach it.

93. Tory, besides inventing her own false statements and false innuendos about the “Males and the Law” section and Roy in her hostile desire to prevent the teaching of a section the contents of which she was ignorant, also enlisted the aid of pejorative quotes from “girlie-guys” who hope that by being PC sycophants, they can avoid being hexed by the likes of Tory.

94. Statements attributed to Dr. Michael Flood that Tory republished in her January 12, 2014, news article (Ex. C) included:

- a. “[T]hese types of male studies ‘really represents the margins.’”
- b. “‘It comes out of a backlash to feminism and feminist scholarship. The new male studies is an effort to legitimise, to give academic authority, to anti-feminist perspectives.’”

95. But did this alleged expert read any of the courses outlines? Don’t know because Tory does not say, but her article clearly infers that Flood’s disparagement of the courses and their creators, which included Roy and his section, relied on some information about Roy and the section that were not included in the article.

96. Flood obviously sides with Tory, and if he lived in America in 1776 would have also sided with the Tories, since the founding fathers were responding to injustices and clearly outside the main body of the British Empire.

97. Tory and Flood, however, rely on the term “margins” to hold the courses and its creators up to contempt, ridicule and moral discredit.

98. Another alleged expert Dr. Ben Wadham is a lecturer at Flinders University, which was founded all of 40 years ago and is ranked at 431 in the bottom half of the QS World University Rankings of 2013, who was used by Tory to disparage the proposed course section and Roy with statements she republished such as:

- a. “‘populist’ male studies”

- b. Roy belongs to “a more hostile [men’s rights] movement”
- c. “[T]he kinds of masculinities which these populist movements represent are anathema to the vision of an equal and fair gendered world.”

99. So, did Wadham read any of the course outlines? Don’t know because Tory does not say, but her article clearly infers that Wadham’s disparagement of the courses and its creators, which includes Roy and his section, relied on some information about Roy and the section that the article never provided.

100. Wadham surely would have opposed the progressive programs of Teddy Roosevelt because they were “populist,” and he would have gleefully “crucif[ied] mankind upon a cross of gold” because William Jennings Bryan was a “populist.”

101. Tory and Wadham, however, rely on the term “populist” to hold the courses and their creators up to contempt, ridicule and moral discredit.

102. Flood and Wadham belong to Tory’s stable of alleged experts, or more accurately media hungry lackeys, whom she quotes in her articles to further her spiteful anti-men’s rights beliefs under the guise of objectivity.

103. Take the hardcore feminist partisan Flood for example. He used some of the same dirty tricks that Nixon’s CREEP (Committee to Re-elect the President) did in 1972. Flood misrepresented himself as a separated father in order to infiltrate the Fathers4Equality organization in Australia. Under his Mata Hari disguise, he then tried to discredit that father’s group by sending out fraudulent letters to members of the Australian parliament to make it appear that members of the organization were unstable.

104. Often, the statements Tory uses from so-called experts attacking any man who disagrees with her are replete with the trigger words of PC obloquy common in today’s societies:

“extreme,” “discredit victims [females]” and “protect perpetrators [males].” For example, in her articles:

- a. Tory Shepherd, *Men’s rights extremists go online*,” The Advertiser-Sunday Mail Messenger, January 10, 2012 (Ex. B):

“Dr Flood says [Men’s Rights Extremists] have already influenced family law, government policy and community attitudes, subtly shifting the balance to better protect perpetrators and discredit victims.”

“[Dr. Flood] says the internet has transformed them [MREs] and allows them to appear a ‘massive horde’ out of proportion to their actual numbers.”

- b. Tory Shepherd, *Carnivorous men’ versus ‘lying bitches’ in sex war*, news.com.au, July 17, 2012 (Ex. G):

“[Dr. Flood] said vitriol and extremism were rife online. He said the false rape allegation claims were a standard way men’s rights activists tried to discredit rape victims. ‘It ends up disempowering victims and protecting perpetrators’, he said, adding that false rape allegations were rare”

105. Joseph McCarthy and Roy Cohn would have been proud of Tory’s effort even though those two were anti-communist while Tory is a Zil lefty. Polar opposites, but they used the same tactics, just like the Nazis and Soviets did.

106. In McCarthy and Cohn’s days, certain words were used to label persons and their creative works as anathemas and affronts to decent thinking people, words such as “communistic,” “red,” “commie sympathizer,” and “fellow traveler.” Today Tory and the hardcore feminists use the opprobrium associated with words such as “anti-feminist,” “right wing,” “extreme,” “hardline,” and “masculine.”

107. The hunters of communists in the 1950s had their “blacklists,” which were kept by private organizations and used by the media to silence lefties, prevent the publication of their works, exile them from academia and destroy their reputations and prospective economic advantages. Today the hunters of the evolutionarily correct keep their “pinklists” on the Internet,

thanks to the many rabid feminist bloggers out for revenge because they were not asked to the senior prom.

108. These “pinklists” serve the same purpose as the 1950s blacklists, only today the lefties are doing the hunting, ostracizing and destroying with unsubstantiated and false accusations.

109. Tory’s second article on the male studies course was dated January 14, 2014, and she headlined it: *University of South Australia gives controversial Male Studies course the snip*. (Ex. E, The Advertiser-Sunday Mail Messenger, January 14, 2014).

110. Why did she use the word “snip”? Tory’s a reporter and presumably chooses her words carefully for the impact she wants to have on her readers. Snip means to make a quick cut. Were her hate-filled desires for the emasculation or circumcision of men’s rights advocates at work? At the very least, the word connotes further feelings of ill will toward the Male Studies courses and its men’s rights creators.

111. In her second article, Tory reports that most of the Male Studies courses, including the section that was to be taught by Roy, were canceled and clearly credits her false and obloquious first article with the “snip”:

The Advertiser revealed yesterday that some of the lecturers listed for the professional certificates had links to extreme men’s rights organisations that believe men are oppressed, particularly by Feminists.

The university yesterday said two short courses that would cover male health and health promotion programs targeting males had been approved, that “no other courses have been approved” and that only university staff would teach the courses.

A statement from the university issued yesterday said only UniSA staff would develop and teach courses, and that the university did not “endorse or support the controversial comments on gender issues” revealed in [the January 12, 2014] Advertiser.

112. In her closing quote, Tory makes clear that in today's world colleges can teach anything so long as it is consistent with hardcore feminist ideology. Tory does this by intentionally and misleadingly equating "anti-feminist" with "anti-women" positions:

National Union of Students president Deana Taylor said a course like that proposed for the university provided "a dangerous platform for anti-women views".

(Ex. E, Tory Shepherd, *University of South Australia gives controversial Male Studies course the snip*, The Advertiser-Sunday Mail Messenger, January 14, 2014).

113. Tory, however, wasn't satisfied with axing Roy's course section about which she knew next to nothing. Her prejudice against men's rights activists drove her to dance on the grave of knowledge and ideas she disagreed with so as to assure such would not be resurrected in the future at the University or any other college. Her emotional rant against the Male Studies courses and their creators, which included Roy and his "Men and the Law" section, continued in her news article of nearly pure common law calumny headlined: *Pathetic bid for victimhood by portraying women as villains*, Tory Shepherd, The Advertiser-Sunday Mail Messenger, January 14, 2014 (Ex. H):

- a. But I'm pretty keen to go over some of the ground that's been covered this week after uncovering plans to have a Male Studies course at the University of South Australia.

With this statement, Tory expressed her intent to repeat her prior false accusations in a new issue of The Advertiser-Sun Mail Messenger in order to once again morally discredit the courses and their creators.

- b. Big ups to UniSA for having the sense to reject anything linked to those at the very fringe of the men's rights spectrum . . . overseas ring ins.

Here Tory falsely states and infers the creators and Roy belong to a lunatic fringe, which carries the imputation that they and he are not wholly sane. The only fringe Roy belongs to is that part

of the dwindling population that believes men are, according to biology, human beings, and therefore, according to Thomas Jefferson, have rights. Tory also likens the creators and Roy to criminal gang members. “Ring in” is an MS-13 gang term meaning members that are called to help in gang wars and fights (sounds a little like Tory). Roy has never been a criminal gang member unless the rugby teams he used to play for are considered criminal gangs.

- c. You’d think I’d shut up now the plans are off the table, but it’s really important to get across the bigger picture. See, most people probably think that the men’s rights guys I was talking about - the ones who habitually call women names, argue that they routinely make up rape, and put it about that women either incite their own domestic violence or are the abusers themselves - are just circle-jerk misogynists.

This shows that Tory is effectively driven by her hatred of men’s rights advocates to convince her readers of the demented view based on undisclosed false factual connotations that there exists a world-wide conspiracy to strip women of their rights. She also explicitly states some of the imputed defamations of her two former articles (Ex. C and Ex. E) in the second sentence. Roy, however, does not “habitually call women names,” he only habitually calls extreme feminists names. Roy does not argue that women routinely make up rape; he argues that false allegations of rape range from 1.5% to 90% depending on the geographical location and study methodology. *False allegations of rape*, The Cambridge Law Journal 65, Rumney, P. (2006). Similarly, he does not argue that women are abusers; he cites statistics from 2007 that 38.7% of child victims were maltreated by their mothers acting alone and 17.9% percent were maltreated by their fathers acting alone. U.S. Dept. Of Health & Human Services, *Child Maltreatment 2007*, p. 29. As for circle-jerk, not quite sure what Tory means by that, never having been to one, but I am sure she has.

- d. They are - misogynists, I mean. And we’re talking old-school misogyny - the hatred of women - as well as the new-school misogyny - entrenched prejudice against women.

As Roy told the U.S. Southern District Court for New York in the Ladies' Nights case, "one can't hate that which one lusts after."

- e. Not just harmless condescension or unthinking stereotypes, but some serious anger.

The imputation from "serious anger" coupled with Tory's out of context quote about Roy's statistically accurate statement that men own most of the guns in America, is, as interpreted by the popular website *We Hunted the Mammoth*, "that men's rights activists may have to take up arms against the evil Feminists who run the world." (David Futrelle, *Australian "Male Studies" initiative under fire because of its connections to raving misogynists; raving misogynists blame feminists*, January 13, 2014, Ex. I). Perhaps against the Government, but Roy never advocated firearms against the politically deluded.

- f. The problem is, the circle is no longer closed, no longer just a bunch of angry guys in a basement. They're trying to get up the stairs and into the light. They want to play outside with legitimate experts in men's issues . . .

Roy is not now, nor has he ever been a troglodyte, and to his knowledge, he is not illegitimate.

- g. It's a classic tactic, used by pseudoscientific fraudsters. Adopt the language of the actual scientists. Find odd reports and old stories, random statistics and shocking anecdotes, and stitch them into a Hannibal Lecter-style creation that mimics valid inquiry.

With this statement, Tory invoked the criminal and civil wrong terminology of fraud to assert Roy was a fraudster, but she could not possibly have concluded that what Roy was going to teach about the law was false because she did not know the specifics of what he was going to teach. Even a blind zealot on a crusade, such as Tory, must still have a portion of her brain entertaining serious doubts when describing that which she lacks knowledge about. The "Males and the Law" section was largely based on law review articles from the mid-1800s to the early 2000s,

including one commissioned by Congress for the federal court in New York. Tory did not know any of that, but went blindly ahead accusing Roy of fraud. The “odd reports and old stories, random statistics and shocking anecdotes” that’s Tory’s specialty, if a lawyer used such to create a false impression, he’s risking his license—something Tory is not constrained by. As for the imputation that Roy is Hannibal Lecter creating a Frankenstein course section of evil, “Males and the Law” just presents what the law was and is, and Roy is neither a serial killer nor a connoisseur of human flesh, which would definitely break his Kathy Freston “The Lean” diet.

- h. Try to sound like the real deal, and look enough like them to fool some people, some of the time.”

Just more unsubstantiated accusations of fraud, but at least Tory is consistent in her falsehoods and obloquy.

- i. Poor boys, trying desperately to claim the mantle of victimhood. It would be pathetic if it wasn’t for the fact that they are trying to make women into villains at the same time.

Tory confirms that her classification of Roy as “anti-feminist” means anti-female by her “women into villains” remark, but here, as elsewhere, she fails to disclose any of the information on which she based that classification. Anti-feminist is not anti-women and Tory, a reporter, knows that. Making such a stereotype classification by equating anti-feminist with anti-women smacks of recklessness—if not an intentional effort to hold up Roy to contempt from Tory’s readers. So why did she do it—hatred of Roy, a men’s rights advocate. Now, to be fair, it is possible that Roy belongs to both “anti” groups, but considering that since the age of 8 years, he has spent a lot of time and money chasing girls, he’s definitely not anti-women, although such might be why he’s now a “poor boy.” As for “claim[ing] the mantle of victimhood,” Roy considers himself more of a target—hopefully a moving target.

- j. It could be dismissed if they weren't trying to creep in where they are not needed, or wanted.

Once again, Tory makes a statement without disclosing the information on which it was apparently based. How did she know the students at the University did not want the slated Male Studies courses, which included learning how the law over the past 250 years discriminated based on sex? Did she take a poll—no. She simply assumed the students did not want the courses before the University even had a chance to carry out its usual procedure for determining whether enough students registered for the courses. Such an assumption is obviously reckless, especially for a newspaper article listed under “News.”

- k. It could be dismissed If they weren't trying to lobby for law changes or to brainwash people into thinking black is white.

Tory's contempt for men's rights advocates, including Roy, is so extreme that, as this quote communicates, they should be denied the right to petition their governments for a redress of grievances. Driven by such ill will, she then makes the unsubstantiated accusation that they, including Roy, are in fact “brainwash[ing] people.” By the time Tory wrote this article, she had interviewed Roy and knew that his section was on the history of the law concerning sex discrimination. (Tory Shepherd, *University of South Australia gives controversial Male Studies course the snip*, The Advertiser-Sunday Mail Messenger, January 14, 2014, Ex. E). Tory chose to ignore what she knew in order to accuse Roy of brainwashing when all he would have done was present legal history on a particular issue.

- l. But these guys drown out any real discussion with their endless angry spittle. And that's the real bitch.

The term “angry” is used today not to describe a human emotion but to derogate, mainly men, as barbarians. For example, “angry white men” raises the specter of guys in sheets burning crosses and worse. As a reporter, Tory is adept with words and their connotations. She intentionally

chose “angry” to communicate that the courses’ creators, including Roy, had breached the gates and were flooding civil discourse on sex discrimination with their innate savagery. As for the word “spittle,” apparently she was evoking images of ranting, zealots spewing forth more than lunatic ideology in order to further denigrate the courses’ creators.

114. Tory’s unslaked spite and hostility for Roy in particular is evinced in her June 18, 2014, news article concerning this legal proceeding, which she titled: *Men’s rights campaigner Roy Den Hollander attacks The Advertiser’s Tory Shepherd in bizarre legal writ filed in New York County*, The Advertiser-Sunday Mail Messenger, June 18, 2014, (Ex. F).

115. Tory wrote and published to her large audiences:

“I probably can’t bang on too much”

“[B]ang on” connotes verbally hammering Roy until he is at least figuratively six feet under and his reputation as an attorney shatters so that he dare not again raise his voice in defense of men’s rights or file a case seeking to enforce such rights.

116. Driven by her irrational hatred of Roy, Tory even apparently relinquished part of her privilege of confidentiality with her lawyer and mostly likely ignored her lawyer’s advice when she wrote,

“Mr Den Hollander, representing himself, has penned a legal document . . . that cannot remain between me and my lawyer. It’s gold and genius like this should be shared.” (Ex. F).

117. Tory’s June 18, 2014, article defamed Roy in his profession as an attorney. Roy has practiced for nearly 30 years in state and federal courts and following law school had been an associate at Cravath, Swaine & Moore.

118. Tory’s false statements imputed dishonesty, deception and professional misconduct, which were injurious to Roy’s profession.

119. Tory wrote and published:

a. “[B]izarre legal writ”

The word “bizarre” connotes there is something off or odd about Roy’s actions as a lawyer, he is legally incompetent and infers that others who may consider hiring him as a lawyer should not. Tory ignores the obvious that among civilized persons there is nothing odd about using the legal system to enforce one’s rights.

b. “UniSA [the University] was planning a course in men’s studies that included men with links to US men’s rights extremists”

Repetition is a disparaging technique that Tory uses well, but in this news article in a different edition for The Advertiser-Sunday Mail Messenger from her other articles, which makes it an independent and new libel, her “extremists” remark is clearly aimed at Roy’s professional reputation as an attorney and officer of the courts before which he practices. It is also false because none of the men’s rights advocates that Roy has represented or communicates with are “extreme.” They are merely advocating for equal treatment under the law.

c. “Mr Den Hollander is a proudly ‘anti-feminist’ lawyer”

The “anti-feminist” remark is another repetition, this time in a different issue of The Advertiser-Sunday Mail Messenger, the meaning of which was dealt with above at ¶¶ 67-71.

d. Roy believes in “censor[ship of] a journalist”

Anyone advocating censorship in a democracy is morally discredited, especially a lawyer who perverts his oath to infringe the free speech of others. The legal protections for free speech, however, do not extend to false defamatory statements made intentionally or with reckless disregard. Tory’s statement that Roy supports censorship of the media is false and recklessly made because she failed to distinguish between protected and unprotected speech or inform her

readers that Roy had worked in the news media. Had she done so, her readers would have questioned the accuracy and motivation for such a statement.

e. Roy is “an extremist by sounding like an extremist.”

More of Tory’s favorite word for disparaging men’s rights activists, still just as false as previously.

f. Tory sarcastically demeans Roy’s legal complaint against her as “Brilliant, no?”

Tory’s sarcasm of “Brilliant, no?” is just another way to say “stupid” and “unintelligent.”

Characterizing the work product of an attorney in such terms discredits his reputation as a lawyer and clearly harms his occupation, which, of course, is what Tory intended.

g. “In the men’s rights vernacular, ‘girlie-guys’ are usually known as ‘manginas’. The terms refer to males who believe in equality for women . . .”

Here Tory communicated the clearly false connotation that Roy does not believe in equality for women because he demeans males who do by calling them “girlie-guys.” Had Tory actually reviewed the civil rights cases brought by Roy, she would have realized that those cases were predicated on equal rights for both sexes. But she did not, so this statement was also recklessly made.

h. “Why on Earth give such a man more publicity? But it’s important, I think, to remain aware and wary of people like Mr Den Hollander.”

Tory’s connotation with this quote is that Roy the attorney is so malevolent that Tory, the epitome of all that is true and just, must warn her audience of 1,750,000 readers to be suspicious of and guarded against Roy and other men’s rights advocates like him. As usual, Tory fails to provide any facts as to her conclusion, but her readers clearly received the message and assumed that Tory knew what she was talking about.

- i. “I suspect the people at UniSA [the University] who flirted with the idea of bringing him [Roy] over to teach may not have really understood his philosophy.”

Tory made an assumption here and communicated that she “really understood [Roy’s] philosophy” even though she interviewed him for all of 10 minutes. She imputes that his philosophy is morally bankrupt, which is what Tory wanted to communicate in order to justify her articles. Tory’s false attribution of a reprehensible philosophy to Roy stereotypes him with all her other boogiemens whom she calls Men’s Rights Extremists.

120. Tory is clearly adept at ignoring the facts, making up false facts, dissembling, prevaricating and using exaggerations and half truths to denigrate those she bears such unrelenting hostility toward—men’s rights advocates.

121. At the very least, Tory published her articles with reckless disregard for their falsities, without regard to their consequences and under circumstances where a reasonably prudent person would have anticipated that injury to other human beings would follow.

122. Tory, like a rooster, crows over her success at intentionally using illegal tactics to gain her hate-filled way against men’s rights advocates, such as Roy, when she wrote:

- a. “A statement from the university issued yesterday said only UniSA staff would develop and teach courses, and that the university did not ‘endorse or support the controversial comments on gender issues’ revealed in yesterday’s Advertiser.” (Tory Shepherd, *University of South Australia gives controversial Male Studies course the snip*, The Advertiser-Sunday Mail Messenger, January 14, 2014, Ex. E).
- b. “After The Advertiser revealed UniSA was planning a course in men’s studies that included men with links to US men’s rights extremists, the course was canned.” (Tory Shepherd, *Men’s rights campaigner Roy Den Hollander attacks The Advertiser’s Tory Shepherd in bizarre legal writ filed in New York County*, The Advertiser-Sunday Mail Messenger, June 18, 2014, Ex. F).

123. Before publishing her June 18, 2014, news article (Ex. F) defaming Roy’s reputation as an attorney, Tory advertised the article on her twitter account texting: “Harpy, dog-

in-heat bacchanalian reporter. Nicest thing anyone’s ever said about me.” (Ex. J, Tory Shepherd, *Tweet*, June 17, 2014). Her admission that some of the statements about her in the original Complaint were virtuous and respectable, synonyms for nice, eliminates any claim for defamation that she may harbor bringing.

Amy McNeilage’s culpable conduct

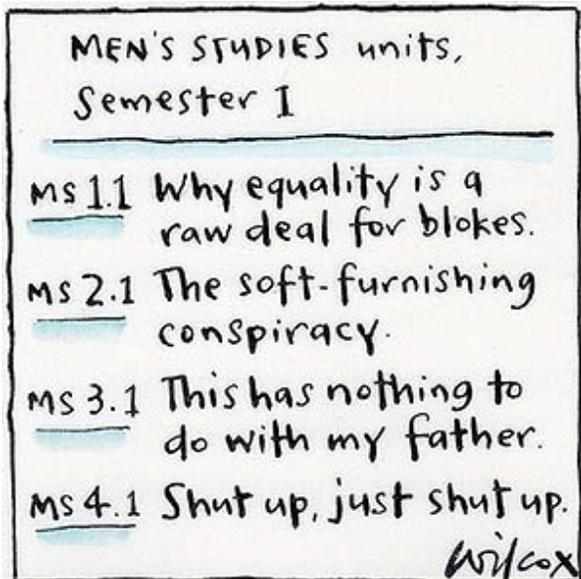
124. Amy, The Sydney Morning Herald reporter, threw her torch onto the electronic bonfire of knowledge unapproved by the *de facto* PC Ministry of Truth with her January 14, 2014 article. (Amy McNeilage, *University of South Australia distances itself from males studies proposals*, The Sydney Morning Herald, January 14, 2014, Ex. D).

125. Amy clearly knew the Male Studies courses in which Roy was to teach a section were being offered by the University, since she wrote “the courses, which were criticised in the media” (Ex. D).

126. Amy set out to injure the courses’ creators by preventing the courses from being taught through her publication of disparaging comments about the courses and its men’s rights creators, including Roy’s “Males and the Law” section and Roy.

127. In doing so, she published false and misleading information and created false impressions concerning the section that Roy would have taught.

128. Amy, most likely driven by an unbalanced urge to punish men for every stupid decision she ever made, was motivated by ill will toward the Male Studies courses and its men’s rights creators, which is plainly demonstrated by the chart at the head of her “male-baiting” article that stereotypically makes false-insulting statements about the courses and their creators, including the “Males and the Law” section:



(Ex. D).

129. Amy uses the false and misleading appellation “hardline anti-feminist advocate[]” in her lead sentence to open her McCarthyite assault of false factual connotations and unsubstantiated accusations motivated by her ill will against the courses and its creators, including the “Males and the Law” section and Roy.

130. To aid her spiteful effort to cancel the courses and thereby intentionally interfere with the interests of the courses’ creators in having the courses taught at the University, Amy enlisted a like-minded censor to quote from:

National Union of Students president Deanna Taylor said it was concerning that the academic who founded the course, Associate Professor Gary Misan, was linked to the controversial Americans. “It’s a slippery slope once you open the door to people with these views and give them a platform . . . it’s not long before proposals like the ones that were rejected actually get approved” she said.

(Ex. D).

131. A journalist, rather than an ideologue bubbling with hostility toward men’s rights advocates, would not have allowed this call for censorship to stand alone by balancing it with something along the following lines:

To impose any strait jacket upon the intellectual leaders in our colleges and universities would imperil the future of our Nation. No field of education is so thoroughly comprehended by man that new discoveries cannot yet be made. Particularly is that true in the social sciences, where few, if any, principles are accepted as absolutes. Scholarship cannot flourish in an atmosphere of suspicion and distrust. Teachers and students must always remain free to inquire, to study and to evaluate, to gain new maturity and understanding; otherwise our civilization will stagnate and die.”

Keyishian v. Board of Regents of University of State of N. Y., 385 U.S. 589, 603 (1967)(Brennan, J.).

132. The Australian Press Council to which Amy’s newspaper belongs requires that “Where individuals or groups are a major focus of news reports or commentary, the publication should ensure fairness and balance in the original article.” (Australian Press Council, *General Statement of Principles* at 3, Ex. K). Obviously when it comes to men’s rights advocates, “principles” take a back seat to Amy’s hatred and self-righteousness.

133. Amy’s objective was clear: destroy dissent and political criticism of that which she assumes are absolute truths in the social sciences and the only ones that universities should be allowed to teach—hardcore feminism and intolerant political correctness.

134. Her *modus operandi*, like Tory’s, is to not only castigate the courses but the courses’ creators so as to abort the message by making statements about both the message and the messengers without regard to the truth or falsity and under circumstances in which a reasonably prudent person should have anticipated that injury would follow.

135. Before publishing her “attack” article, Amy, as with Tory, failed to interview Roy to determine what he was going to teach in the “Males and the Law” section. That imputes she was not motivated by the quality of the education received at the University but rather by a desire to harm Roy’s section by disparaging it and him in her effort to stop the section from being taught.

136. If Roy had not been a men's rights advocate, Amy, like any bush league reporter, would have first determined what was going to be taught before publishing an article concerning a course section at a university.

137. Had Amy followed the ethics of her profession and determined the content of the "Males and the Law" section before slinging her rabid-feminist mud, her readers, assuming she told them the truth, would have had a completely different impression of that section—one that was based on the truth rather than her misleading statements masquerading as facts.

138. Amy, like Tory, did not know how Roy defined the term feminism; yet she intentionally used the description "anti-feminist" to discredit his section of a course the way a reporter for *Pravda* in the old Soviet Union would have used the term "anti-communist" to discredit the work of a Soviet-dissident. At least a Russian commie reporter could point to intellectuals such as Marx and Lenin to define "Communism," who can Amy point to for a definition of feminism—her fellow coeds in consciousness lowering sessions at Charles Sturt University? Charles Sturt University is not even ranked by the QS World University Rankings of 2013.

139. Instead of picking "extreme" from the reporter's grab bag of disparaging words, Amy pulled "hardline" and "radical." She intentionally used them to paint a false picture of Roy, and infer that the "Males and the Law" section would advocate the elimination of rights for females, such as muzzling them on college campuses the way she and Tory muzzled male points of view at the University by abusing their power of the press.

140. Amy could not possibly know what the "Males and the Law" section would teach because she had not interview Roy nor reviewed the copyrighted contents of the section.

Therefore, her imputation of its contents and her disapproval of the section were based on ignorance. Most reporters get the facts before writing a story but not Amy.

141. Amy uses “radical” the way Tory uses “extreme,” to depict Roy and by association his section of the course as dangerous. Amy wrote that Roy had “been published on radical men’s rights websites.” (Amy McNeilage, *University of South Australia distances itself from males studies proposals*, The Sydney Morning Herald, January 14, 2014, Ex. D).

142. Okay, Amy, which ones? She doesn’t say. Was she pulling a “McCarthy” when he said he had a list of known communists working in the U.S. State Department but never made the list public? At the very least, she was referring to information that she did not provide her readers.

143. Amy uses the word “radical” because she knows her readers will read it as connoting iniquity and never realize that the following were also called “radicals” whose activities actually benefitted mankind: America’s founding fathers, abolitionists, the South Australian Fabian Society, Australian Lucy Morice, Radical Women, the Paris Commune, anti-Vietnam War demonstrators, environmentalists and many others demonized by the press of their day.

144. Amy wrote that Roy had “filed a lawsuit against Columbia University for offering women’s studies courses that preached a ‘religionist belief system called feminism’.” (Ex. D). She intentionally cherry picked one issue from the case, which had three issues, in an effort to further disparage Roy and by inference the “Males and the Law” section.

145. The case was against the U.S. Department of Education, the Board of Regents for the State of New York and Columbia University charging the violation of Equal Protection, Title

IX, and the Establishment Clause in supporting and encouraging only Women's Studies programs but no Men's Studies programs.

146. By 2016 in the U.S., females will receive 64% of the Associate's Degrees, over 60% of the Bachelor's Degrees, 53% of the Professional Degrees, and 66% of the Doctor's Degrees. National Center for Educational Statistics, *Digest of Educational Statistics*, Table 258. If anyone needed help in getting into college and graduating—it was men.

147. The courts, however, refused to recognize that it was fundamentally unfair to have a Women's Studies program but no Men's Studies program, even though when a college has only a boys' rugby team, and the girls want one, the girls get one.

148. The case tried to at least temper New York State's higher education's enthusiastic and exclusive propagation of hardcore feminism through Women's Studies and allow countervailing masculine perspectives to enter the ivy tower to challenge extreme feminist orthodoxy harmful to men.

149. Higher education's banishment of Men's Studies scholarship, such as that offered by Dr. Warren Farrell, advances wholesale acceptance of hardcore feminism's invidious discrimination of men, which is inimical to the educational missions of fostering equal justice, ensuring a diverse student and alumni body, and helping both sexes find careers. It also has a deleterious impact on society as a whole, since “[n]o one should underestimate the vital role in a democracy that is played by those who guide and train our youth.” *Keyishian v. Board of Regents of University of State of N. Y.*, 385 U.S. 589, 603 (1967).

150. But Amy doesn't care about an education that helps everyone because to her men are the incorrect sex, so her article intentionally tried to discredit that case of Roy's by failing to mention the other causes of actions and focusing on the innuendo that allegations of extreme

feminism as a religion are absurd. To hardened, intolerant feminists and those scared of them, yes, but the U.S. Supreme Court and Court of Appeals cases on religion indicate otherwise.

151. Amy also used quotes from ultra-feminist academic Eva Cox who emotionally opposes any Male Studies courses, especially ones taught by men's rights advocates.

152. Amy gave free play to Cox's spite and desire to thwart the interests of men's rights advocates by printing Cox's all too common tactic that whenever the establishment of the day violates the rights of a group, and that group fights back, the establishment mocks them in the hope they will give up.²

153. Amy printed a Cox quote that derided the creators of the courses and men in general: "men who want to complain that they haven't had enough attention as victims, and that does worry me." (Ex. D). What, Cox worry? Absurd, no man would want attention from her, now Amy is a different story.

154. In another quote by Cox that Amy printed: "some men have difficulties with going to doctors." (Ex. D). Cox and Amy must have laughed gleefully over that statement. It is meant as derision toward men in general, but cannot possibly apply to Roy, since whenever he injured himself playing Lacrosse, Rugby, or now Krav Maga, he hurried down to the emergency room to flirt with the nurses and exploit their Florence Nightingale qualities. Qualities that Cox and Amy admittedly lack.

155. Amy also wrote the Male Studies courses were "rejected in 2012"—that was false. Sixth of the eight courses, including the course with the "Males and the Law" section,

² Establishment means a unitary belief system held by enough influential persons so that it dominates over other beliefs in a society, such as the principles of the Declaration of Independence and the Constitution. Today, that belief system is Feminism and its sister ideology Political Correctness.

were canceled as a result of Tory's first article and Amy's one article, both published in January 2014 before the courses were canceled. The reason for Amy's falsehood was, on information and belief, to keep these two online newspapers and their reporters from being sued for injurious falsehoods and tortious interference with a prospective economic advantage, since the 2012 cancellation would mean their articles were not the cause of the cancellation.

Causes of Action

Injurious Falsehoods

156. Tory and Amy knowingly or with reckless disregard published falsehoods and false factual connotations concerning (1) the property interest of Roy in his copyrighted compilation the "Males and the Law" section of a Male Studies course and (2) Roy so as to intentionally harm him by aborting that section of the Male Studies course for which he would have received a fee to teach and to indirectly disparage his copyrighted compilation.

157. If Tory in writing her January 12, 2014, news article and Amy in writing her January 14, 2014 news article did not know their disparaging statements concerning the "Males and the Law" section and Roy were false, or they were not motivated by ill will, or did not make their statements with the intent to interfere with Roy's interests; they clearly made them with reckless disregard as to their truth or falsity, without regard to the consequences, and under circumstances where a reasonably prudent person would have anticipated that injury to another human being would follow.

158. The falsehoods, motivated by spite, hostility and ill will were calculated in the ordinary course of things to produce, and did produce actual damage to Roy's economic and legal relationship with the University in an amount capped at \$1250, the maximum amount he would have been paid for teaching the "Males and the Law" section depending on the hours.

Tortious Interference with Prospective Contractual Relations

159. Tory and Amy's purpose in publishing their first articles was to keep the creators of the Male Studies courses from teaching their course sections at the University, which included the "Males and the Law" section to be taught by Roy. Tory and Amy knew or were substantially certain such would occur as a result of their actions.

160. Tory intended her article of January 12, 2014 (Ex. C) and Amy intended her article of January 14, 2014, (Ex. D) to directly interfere with the prospective contractual relations between Roy and the University for Roy to teach the "Males and the Law" section of a Male Studies course for a fee.

161. Tory and Amy were motivated solely by a desire to harm the creators of the Male Studies courses, including Roy, by keeping them from teaching their respective sections at the University when Tory and Amy used their power of the media to pressure the University into aborting the courses with the result that the University canceled six of the eight courses, including the "Males and the Law" section.

162. Tory and Amy are "reporters"—not lawyers trained and experienced in understanding and communicating what the law is on a particular topic. Plaintiff has been interpreting and communicating about the law for nearly 30 years. Tory and Amy are not in competition with him; therefore, their motive to interfere with his prospective contract to teach law was not legitimate economic self interest but spite for men's rights activists who do not curtsy to their intolerant ideologies.

163. Tory and Amy also engaged in wrongful means that aborted six Male Studies courses by dishonestly characterizing the creators, including Roy, and the Male Studies courses, including the section "Males and the Law," as extreme right wing, railing against feminism

[women], referring to women as bitches and whores, advocating gun violence, lacking in academic rigor, on the margins of society, extreme activists, hostile toward women and non-whites, opposed to an equal and fair world, not objective and dangerous to women.

164. In authoring and publishing their articles, Tory and Amy engaged in purposeful misrepresentations in that many of their deceptive, misleading and untrue statements which disparaged the section Roy would have taught and himself were false in the sense in which they were intended and understood by the public, including the University.

165. Tory and Amy violated news media established customs and ethics in order to create and publish their intentionally fallacious communications by unfairly and improperly failing to even interview Roy about the section he was slated to teach before they wrote and published their first articles. This purposeful avoidance of the truth enabled them to make up whatever they wanted in order to mobilize public opinion and pressure the University into keeping the courses from being taught at the University.

166. As reporters for newspapers with large audiences—The Advertiser-Sunday Mail Messenger 1,750,000 and The Sydney Morning Herald 5,580,000, which includes print and online—Tory and Amy hold positions of power in society, and with that power comes the ability to intimidate others, including public Universities, into doing their bidding.

167. Tory and Amy unfairly and inappropriately used that power to interfere with the University's lawful liberty to offer six courses, including one with the "Males and the Law" section, causing the University to abort that section and cause damage to Roy's pecuniary interests, including the value of his copyright in the section.

168. Had it not been for Tory and Amy's desire to harm the creators of the Male Studies courses by their wrongful and unjustified publications (Tory's January 12, 2014 article

(Ex. C) and Amy's January 14, 2014 article (Ex. D)), Roy would have entered into a contract with the University for teaching the section on "Males and the Law," and most likely taught the same section at other colleges.

169. Tory and Amy's interference damaged Roy's economic interests in the amount of the fee he would have received for teaching his section, which was a maximum of \$1250, and lost opportunities for teaching the same section in other universities by damaging his copyright interests in the "Males and the Law" in the amount of \$5,000.

Prima Facie Tort

170. In the alternative, Tory and Amy are liable under *prima facie* tort in that if their acts are found to be lawful, their sole motivation in harming the men's rights creators of the Male Studies courses by preventing them from teaching and being paid for such, including Roy teaching the "Males and the Law" section, was Tory and Amy's "disinterested malevolence" to invidiously discriminate against men's rights activists in authoring and publishing their articles. (Exs. C and D).

171. Tory and Amy took active steps without justification to prevent the courses' creators, including Roy, from teaching their respective sections by ostracizing them in their two articles and engaging the aid of others, whom they quoted in those articles, to support their "pink-listing" of the courses' creators as dangerous to woman because they were men's rights activists.

172. The actions in pink-listing the creators of the courses, including Roy, was motivated by a desire for revenge against men's rights advocates rather than any economic interest the advancement of which would constitute a lawful reporter's objective, and that the

singling out of the creators for punishment in this manner went beyond the bounds of economic justification.

173. The wholesale invidious discrimination against men's rights activists teaching Male Studies courses was not warranted as legitimate reporting.

174. Evidence of Tory and Amy's invidious discrimination toward men's rights activists includes that they did not publish articles criticizing Women's Studies at the University even though some of its courses propagate misogyny.

175. Tory and Amy's actions are without lawful justification because in their effort to injure the creators of the Male Studies courses, including Roy, they censored ideas and knowledge, and in Roy's case, knowledge of the history of the law.

176. Universities were supposed to be open to differing views, but today under hardcore feminism, the winds of a cult-like conformity blow through the halls of academia when centers of learning and the press believe they have discovered the one and only truth.

177. Roy incurred financial damage in losing his fee for teaching his section, which was capped at a maximum of \$1250.

Defendant Tory Shepherd's Libel

178. In four news articles authored by Tory and published to The Advertiser-Sunday Mail Messenger's 1,750,000 audience and the World Wide Web, she wrote numerous statements that from the context of her news articles make clear they were about Roy because not only was he specifically identified, but he was also a member of the small group of slated lecturers and creators of the Male Studies courses.

179. Tory's written statements that are false and susceptible of a defamatory meaning from her January 12, 2014, news article *Lecturers in world-first male studies course at*

University of South Australia under scrutiny (Ex. C), which she wrote without even interviewing Roy or reviewing the content of the “Males and the Law” section in a purposeful avoidance of the truth in which Roy, an attorney, was identified as one of the lecturers, follow:

- a. Lecturers “have been linked to extreme views on men’s rights and websites that rail against feminism.”
- b. “Two lecturers [includes Roy] have been published by prominent US anti-feminist site A Voice for Men, a site which regularly refers to women as ‘bitches’ and ‘whores’ and has been described as a hate site by the civil rights organisation Southern Poverty Law Centre.”
- c. “One American US lecturer . . . has written that the men’s movement might struggle to exercise influence but that ‘there is one remaining source of power in which men still have a near monopoly—firearms’.”
- d. Roy, an attorney, was one of “the more extreme activists.” This is as highly injurious to professional reputation as calling an attorney a communist in the 1940s.
- e. Roy “blames feminists for oppressing men.”
- f. “The course, which has no prerequisites [including Roy’s “Males and the Law” section]”
- g. “[U]niversities needed to uphold research based traditions instead of the populist, partisan approach driven by some” such as Roy.
- h. Republication of defamatory statements:
 - i. “[T]hese types of male studies ‘really represents the margins.’”
 - ii. “‘It comes out of a backlash to feminism and feminist scholarship. The new male studies is an effort to legitimise, to give academic authority, to anti-feminist perspectives.’”
 - iii. “‘populist’ male studies”
 - iv. Roy belongs to “‘a more hostile [men’s rights] movement’”
 - v. “‘[T]he kinds of masculinities which these populist movements represent are anathema to the vision of an equal and fair gendered world.’”

180. Tory's written statements that are false and susceptible of a defamatory meaning from her January 14, 2014, news article *University of South Australia gives controversial Male Studies course the snip* (Ex. E) where Roy is once again identified as one of the creators and lecturers:

- a. "[T]hat some of the lecturers listed for the professional certificates had links to extreme men's rights organizations"
- b. "US 'anti-feminist' lawyer Roy Den Hollander"
- c. "Mr Den Hollander also stood by his claim that men's remaining source of power was 'firearms'." Here Tory even edited her quoted statement in her January 12th article to ratchet up her obloquy by leaving out "one" as the qualifier for "remaining source of power."

181. Tory's written statements that are false and susceptible of a defamatory meaning from her January 14, 2014, article *Pathetic bid for victimhood by portraying women as villains*, (Ex. H), which was listed under "News." Given her statement that "I'm pretty keen to go over some of the ground that's been covered this week after uncovering plans to have a Male Studies course at the University of South Australia," it clearly includes Roy in the group of men she is attacking with her stiletto words:

- a. "Pathetic bid for victimhood by portraying women as villains"
- b. "Big ups to UniSA for having the sense to reject anything linked to those at the very fringe of the men's rights spectrum . . . overseas ring ins. ("Ring in" is a gang term meaning persons that are called to help in gang wars/fights).
- c. "They are - misogynists, I mean. And we're talking old-school misogyny - the hatred of women - as well as the new-school misogyny - entrenched prejudice against women."
- d. "Not just harmless condescension or unthinking stereotypes, but some serious anger."
- e. "The problem is, the circle (Tory is referring to "circle-jerk misogynists") is no longer closed, no longer just a bunch of angry guys in a basement. They're trying to get up the stairs and into the light.

- f. “They want to play outside with legitimate experts in men’s issues”
- g. “It’s a classic tactic, used by pseudoscientific fraudsters . . . [to create] a Hannibal Lecter-style creation that mimics valid inquiry.”
- h. “Try to sound like the real deal, and look enough like them to fool some people, some of the time.”
- i. “It would be pathetic if it wasn’t for the fact that they are trying to make women into villains at the same time.”
- j. “It could be dismissed if they weren’t trying to creep in where they are not needed, or wanted.”
- k. “It could be dismissed If they weren’t trying to lobby for law changes or to brainwash people into thinking black is white.
- l. “But these guys drown out any real discussion with their endless angry spittle. And that’s the real bitch.

182. Tory’s written statements that are false and susceptible of a defamatory meaning to Roy’ profession as an attorney from her June 18, 2014, article *Men’s rights campaigner Roy Den Hollander attacks The Advertiser’s Tory Shepherd in bizarre legal writ filed in New York County*, (Ex. F):

- a. “[B]izarre legal writ”
- b. “UniSA [the University] was planning a course in men’s studies that included men with links to US men’s rights extremists”
- c. “Mr Den Hollander is a proudly “anti-feminist” lawyer”
- d. Roy believes in “censor[ship of] a journalist”
- e. Roy is “an extremist by sounding like an extremist.”
- f. Tory sarcastically demeans Roy’s legal complaint against her as “Brilliant, no?”
- g. Tory communicated that Roy does not believe in equality for women because he demeans males who do by calling them “girlie-guys.” Tory wrote “In the men’s rights vernacular, ‘girlie-guys’ are usually known as ‘manginas’. The terms refer to males who believe in equality for women”

- h. “Why on Earth give such a man more publicity? But it’s important, I think, to remain aware and wary of people like Mr Den Hollander.”
- i. “I suspect the people at UniSA who flirted with the idea of bringing him over to teach may not have really understood his philosophy.”

183. The purpose of Tory’s June 18, 2014, article attacking Roy’s exercise of his historic right to vindicate harm to his reputation via the courts, especially his professional reputation, was to intimidate him into withdrawing this action by sending him the message that she would continue to harm his occupation by using her position as a reporter to denigrate, demean and defame Roy and his practice of the law with her direct falsehoods and false connotations to her worldwide audience, which includes readers in New York.

184. Tory’s statements were false because they had a different effect on the minds of her audience from that of the truth.

185. In addition to her outright false and defamatory statements, such as Roy has been “identified as belonging to extreme right wing groups in the USA,” Tory artfully defames by making false and defamatory suggestions, impressions and implications arising from otherwise accurate quotes taken out of context, such as the internal quotation include in “One American US lecturer [Roy] . . . has written . . . that ‘there is one remaining source of power in which men still have a near monopoly—firearms,’” which infers, according to the conclusion reach by the popular Australian website *We Hunted the Mammoth*, “that men’s rights activists may have to take up arms against the evil Feminists who run the world.” (David Futrelle, *Australian “Male Studies” initiative under fire because of its connections to raving misogynists; raving misogynists blame feminists*, January 13, 2014, Ex. I).

186. Tory made and wrote her defamatory statements knowing they were false or with reckless disregard for whether they were false, which amounts to constitutional malice.

187. Tory knew the statements were false or had serious doubts as to the truth of the statements or made the statements with a high degree of awareness that they were probably false.

188. Tory made and wrote her defamatory statements with a state of mind and motive of ill will, bias, spite and prejudice toward Roy because she knew he was a men's rights activist.

189. Evidence of Tory's reckless disregard for the truth is that she failed to meet the standards of her profession in information gathering and dissemination:

- a. Tory did not misread the outline or content of Roy's "Males and the Law" section—she did not read either at all, nor did she even interview Roy before her first libelous article on January 12, 2014.
- b. When she finally got around to interviewing Roy, it was a cursory, cover her tail 10 minute interview.
- c. Tory failed to conduct a reasonable search of material, or do any original research on Roy.
- d. Tory relied on sketchy, one-sided and anti-men's rights material whose reliability the press community considered low and which would have raised in an objective and fair-minded reporter substantial questions as to their accuracy and the good faith of the authors of those materials.
- e. Tory cherry-picked any research matter that depicted Roy in a negative, anti-women light.
- f. Tory knew that she wanted to find any indication, no matter how untrustworthy and indicative of falsehood, that Roy was, as she often rails against in her articles, a "Men's Rights Extremist," so in her investigation, if one could call it that, she

simply avoided the truth with a deliberate decision not to acquire knowledge of facts that might confirm the falsity of the statements she was going to publish.

190. Further evidence of Tory's constitutional malice is that her written articles as analyzed above violated the Australian Press Council's *General Statement of Principles* (Ex. K) to which her newspaper subscribes:

- a. "Publications should take reasonable steps to ensure reports are accurate, fair and balanced. They should not deliberately mislead or misinform readers either by omission or commission." *General Principle 1.*
- b. "Where individuals or groups are a major focus of news reports or commentary, the publication should ensure fairness and balance in the original article." *General Principle 3.*
- c. Publications are free to advocate their own views and publish the bylined opinions of others, as long as readers can recognise what is fact and what is opinion. Relevant facts should not be misrepresented or suppressed" *General Principle 6.*
- d. "Publications should not place any gratuitous emphasis on . . . gender" *General Principle 8.*

191. Tory also violated her own paper's, The Advertiser-Sunday Mail Messenger's, Code of Conduct (Ex. L):

- a. "Try always to tell all sides of the story in any kind of dispute. Every effort must be made to contact all relevant parties." (Ex. L, [The Advertiser-Sunday Mail Messenger] Code of Conduct at 1.4).

Tory's effort to contact Roy before the publishing her first article on January 12, 2014, was woefully inadequate. She sent Roy an email asking for his telephone number, which raises the question as to how she obtained the email address. Email addresses are more difficult to look up than telephone numbers. In addition, on every federal court document that Roy ever filed, including in the cases Tory refers to in her articles, his telephone number is listed and these documents are available to the public online. Further, there have been a number of news reports

concerning Roy that are listed on the Internet. A call by Tory to one of the reporters would have resulted in Roy's number.

b. "Do not knowingly withhold or suppress essential facts." (Ex. L at 1.5).

Why did it take Tory until after the University canceled the course to ask Roy the content of the "Males and the Law" section? She could have done that in her first email but didn't because she did not want any facts to interfere with the fraudulent image she had decided on projecting to her audience concerning Roy. All that mattered to her was that in her paranoid mind an MRE had prepared the section and would teach it.

192. Tory communicated her written words to her editor at The Advertiser-Sunday Mail Messenger and, on information and belief, to other employees at the newspaper and associates of Tory.

193. As a result of Tory's actions, her written words and innuendos were distributed to The Advertiser-Sunday Mail Messenger's 1,750,000 audience and across the World Wide Web that circulated her statements to unknown persons, which Tory intended.

194. Tory's written statements were reasonably susceptible of meaning that rendered them defamatory *per se* because they brought Roy into contempt and ridicule by asserting moral discredit on him and also resulted in the University community depriving him of association with its members.

195. Tory intentionally ridiculed Roy and his professional ability that discredited him as a lawyer.

196. Tory's written statements also imputed Roy lacked professional integrity and that he was not only unfit to practice law but also unfit to teach the law.

197. Tory's written statements imputed the existence of false factual connotations about Roy and his professional ability that were unknown to her audience.

198. Tory's written statements impaired and continue to impair Roy's professional reputation, impaired and continue to impair his profession as a lawyer, cost him business opportunities and good will, injured and continue to injure his business relations by tending to expose him to hatred, obloquy, contempt, ridicule, aversion, ostracism, degradation and to induce an evil opinion of him in the minds of a substantial number of persons, Tory's audience and the University's community.

199. Tory's written statements prevented Roy from teaching the "Males and the Law" section at the University and other colleges, which would have resulted in pecuniary gain to him.

200. Tory's written statements were intentionally chosen because as a matter of common knowledge they were meant to scorn, ridicule, harass and injure.

201. Tory's written publication of false and injurious statements by those she quoted and paraphrased make her personally liable because New York does not recognize the "neutral reporter" privilege.

202. The defamatory tendency of a statement depends upon the "temper of the times" and the "current of contemporary public opinion." *Mencher v. Chesley*, 297 N.Y. 94, 100 (1947). A statement that is harmless in one age may be considered highly damaging to reputation in another time.

203. In the 1940s, linking an attorney to a communist organization that imputed the attorney was in accord with the Communist Party's aims and methods in a written article was libelous, *Grant v. Reader's Digest Ass'n*, 151 F.2d 733, 734 (2d Cir. 1945)(Hand L., J.), *cert. denied*, 66 S.Ct. 492 (1946).

204. Today, linking Roy to “extreme men’s rights organizations,” “to extreme views on men’s rights and websites that rail against feminism,” to “a hate [web]site,” and labeling him as a “more extreme [men’s rights] activist[,]” “anti-feminist [meaning anti-female],” “misogynist,” “pseudoscientific fraudster[,]” and a “Hannibal Lecter” who is filled with “hatred of women,” “prejudice against women,” “serious anger [toward women]” are just as libelous as false accusations of being a Communist in the 1940s because they arouse hatred, contempt, scorn and obloquy.

205. Tory’s written words were not pure opinions because they infer they were based on undisclosed facts and those undisclosed facts were gross misrepresentations of the truth.

206. All her articles were published under the heading “NEWS.” (Exs. C, E, F, H).

207. Tory’s written words were not intended as humor.

208. Tory’s written words imputed features of Roy’s professional reputation that are *per se* harmful for an attorney in this day and age: lack of integrity, hatred of women, as evil as Hannibal Lecter, defrauder, untrustworthy, bigoted against women, unreliable and not sane.

209. Tory’s words, as she admits in her articles, were a substantial factor in the University canceling Roy’s “Males and the Law” section of a Male Studies course:
From Ex. E, Tory Shepherd, *University of South Australia gives controversial Male Studies course the snip*, The Advertiser-Sunday Mail Messenger, January 14, 2014:

- a. “CONTROVERSIAL aspects of a Male Studies course will not go ahead”
- b. “The Advertiser revealed yesterday that some of the lecturers listed for the professional certificates had links to extreme men’s rights organizations”
- c. “A statement from the university issued yesterday said only UniSA staff would develop and teach courses, and that the university did not ‘endorse or support the controversial comments on gender issues’ revealed in yesterday’s Advertiser.”

From Ex. H, Tory Shepherd, *Pathetic bid for victimhood by portraying women as villains*,
The Advertiser-Sunday Mail Messenger, January 14, 2014:

- d. “But I’m pretty keen to go over some of the ground that’s been covered this week after uncovering plans to have a Male Studies course at the University of South Australia. Most of the courses now won’t go ahead”
- e. “Big ups to UniSA for having the sense to reject anything linked to those at the very fringe of the men’s rights spectrum”
- f. “You’d think I’d shut up now the plans are off the table”

From Ex. F, Tory Shepherd, *Men’s rights campaigner Roy Den Hollander attacks The Advertiser’s Tory Shepherd in bizarre legal writ filed in New York County*, The Advertiser-Sunday Mail Messenger, June 18, 2014:

- g. “After The Advertiser revealed UniSA was planning a course in men’s studies that included men with links to US men’s rights extremists, the course was canned.”

Libel damages

210. Roy seeks special damages in an amount up to \$1250 for Tory’s libel, which is the maximum amount Roy would have received for teaching the “Males and the Law” section, assuming such an amount is not awarded from the Injurious Falsehoods, Tortious Interference or *Prima Facie* Tort causes of action in this case.

211. Roy requests the jury determine the compensatory damages not only for past harm but also for future harm caused by Tory’s libelous articles.

212. In addition to constitutional malice, Tory made her defamatory statements with a deliberate intent to injure and out of hatred, ill will or spite and with willful, wanton or reckless disregard for Roy’s rights.

213. Tory knew full well the harm her words would cause and, in fact, was motivated by a desire to injure a men' rights activist by trashing Roy's reputation and thereby causing the cancellation of Roy's "Males and the Law" section.

214. Roy, therefore, also requests the jury grant him \$300,000 in punitive damages from Tory personally and individually in order to deter her in the future from abusing her position as a reporter by willfully and wantonly causing hurt and injury to another and to serve as a warning to others.

The danger from the likes of Tory and Amy

215. The explanation behind the irresponsible actions of Tory and Amy is simple: they hate, loathe and fear men's rights activists, so when they learned that some would be teaching college courses, they didn't bother to find out what would be taught but immediately ripped off their verbal high heels to impale the course and injure those men who would dare stand up for the rights of other men.

216. What is it that these two powerful reporters fear? If they had first determined what was going to be taught in the Male Studies courses and heard the evidence presented by its teachers, their knowledge would have been improved. And, if they did not find reasonable what they heard, they could walk over to the University's Women's Studies program for succor. But no, men's rights advocates were going to teach, and these reporters' irrational fear and hatred required the courses be torched and the teachers gagged.

217. Are hardcore feminists and intolerant PCers the only ones to determine what the young in any country can hear? Aren't college students wise enough to decide for themselves? If someone tries to teach them an incredible history or theory, they wouldn't pay much attention

to it. Isn't it often the case in history that the self-appointed protectors of youth censor knowledge in order to protect the protectors' positions and righteousness?

218. As defense attorney Dudley Field Malone in the Scope Trial said, "The least that this generation can do . . . is to give the next generation all the facts, all the available data, all the theories, all the information that learning, that study, that observations has produced—give it to the children in the hope of heaven that they will make a better world of this than we have been able to make it. . . . [L]et the children have their minds kept open—close no doors to their knowledge; shut no door from them."

219. Let both Male Studies and Women Studies be taught. Let them both live. Let the duel between them be fought out in the centers of learning rather than the media or the courts where the limitations of the medium, mendacity and superficially pithy statements substitute for understanding. In the end, the truth will win out. There is no need for Tory and Amy to be fearful of it.

220. The creators of the Male Studies courses were ready to tell the truth as they understood it, and they did not fear the truth that others could present as facts for the courses' creators stand with intelligence, open mindedness and the fundamental freedom to learn. Unlike Tory and Amy, the creators of the Male Studies courses are not afraid of facts or differing theories because that is how knowledge progresses.

221. Unfortunately, thanks to Tory, Amy, their unthinking followers and their fear ridden targets, the message from down under is clear. On college campuses, everybody's freedom to learn and free speech are limited to ingesting and parroting hardcore feminist propaganda as determined by the self-appointed members of the PC Ministry of Truth, such as Tory, Amy, and other purveyors of ignorance and unanimity.

222. The part of the media that has been infected by hard-line feminists, such as Tory and Amy, uses its power to inhibit the flow of ideas and invidiously treat differently those with unpopular viewpoints by suppressing their speech in favor of politically correct speech. Today unpopular viewpoints are a masculine perspective beneficial to males.

223. The real danger that is demonstrated in this case, which Edward R. Murrow would describe as a small picture demonstrating a larger societal problem, is that

Feminism, like “[n]ationalism is a relatively recent phenomenon but at other times and places the ends have been racial or territorial security, support of a dynasty or regime, and particular plans for saving souls. As first and moderate methods to attain unity have failed, those bent on its accomplishments must resort to an ever-increasing severity. As governmental pressure toward unity becomes greater, so strife becomes more bitter as to whose unity it shall be Ultimate futility of such attempts to compel coherence is the lesson of every such effort from the Roman drive to stamp out Christianity as a disturber of its pagan unity, the Inquisition, as a means to religious and dynastic unity, the Siberian exiles as a means to Russian unity, down to [the failed] efforts of [World War II’s] totalitarian [regimes]. Those who begin coercive elimination of dissent soon find themselves exterminating dissenters. Compulsory unification of opinion achieves only the unanimity of the graveyard.”

West Virginia State Board of Education v. Barnette, 319 U.S. 624, 640-42 (1943)(Justice Jackson).

Damages

224. The total compensatory damages sought from Defendants for Injurious Falsehoods, Tortious Interference or, in the alternative, *Prima Face* Tort is a maximum of \$6250, which consists of the maximum amount Roy would have received for teaching the “Males and the Law” section at \$1250, and \$5,000 for the diminution in value of his copyrighted compilation, since other universities are not about to offer a similar section after the Defendants’ actions.

225. In addition, Roy seeks \$50,000 in punitive damages from Defendants for Injurious Falsehoods, Tortious Interference or, in the alternative, *Prima Face* Tort as a result of

Tory and Amy's conscious and deliberate disregard of the interests of others that made their conduct willful or wanton.

226. In the Defamation cause of action, Roy requests the jury determine the compensatory damages not only for past harm but also for future harm, and, in addition, grant him \$300,000 in punitive damages from Tory personally and individually as punishment for gross misbehavior and to serve the public good by acting as a deterrent upon Tory so that she will not repeat her offense.

227. Any award of damages from any of the causes of action will be donated to a deserving charity.

228. Roy also seeks reimbursement for his out of pocket expenses.

Conclusion

229. One purpose of this case is to put on notice the private "pinklisters" and those who use them that they are legally liable for the professional and financial damage they cause.

230. Tory and Amy wrap themselves in the flag of feminism to justify the imposition of a unitary belief-system of extreme feminist orthodoxy for dictating the thought, speech, and conduct of members of the educational community and society-at-large. Thanks, in part, to these two hardcore feminists and their androgynous male sycophants, teachers are under constant surveillance; their pasts are combed for signs of PC disloyalty; their utterances are watched for clues to dangerous anti-feminist thoughts. The Soviet Union used similar tactics to ostracize anti-communists to the Gulags. Today the extreme feminists simply keep those who disagree with them out of the universities. What are they afraid of? I thought they were "strong and independent persons."

Verification

Roy Den Hollander, being duly sworn, deposes and says that I am the plaintiff in this proceeding, have written the foregoing complaint and know the contents of, which are true to my knowledge, and to those matters that I believe to be true.

/S/

Roy Den Hollander
Plaintiff and attorney
545 East 14 St., 10D
New York, N.Y. 10009
(917) 687 0652
roy17den@gmail.com

Sworn to before me on
5th day of October 2014

/S/

Notary Public

Exhibit A

The Boston Globe

CATHY YOUNG

Women Against Feminism: Some women want equality without anger

By Cathy Young

SEPTEMBER 02, 2014

DO AMERICAN women still need feminism? A controversial social media movement called Women Against Feminism features women explaining — mostly in “selfies” with handwritten signs — why they do not. Feminist responses have ranged from bafflement to vitriol or mockery to arguments that these women don’t know what feminism is. But while this new movement has its silly aspects, it raises some much-needed questions about feminism’s present and future state — and, in the weeks since it first attracted notice, many prominent feminists have helped validate some of the criticisms.

One might assume that Women Against Feminism is a traditionalist backlash against gender equality. Yet many of the women say they reject feminism precisely because they are pro-equality. A blogger who goes by AstrokidNJ has analyzed a week’s worth of posts on Women Against Feminism and found that 46 percent were egalitarian, 19 percent endorsed men’s issues, and 12 percent criticized feminist intolerance toward dissent. Only 23 percent reflected traditionalist views such as support for distinct sex roles, chivalry, or full-time motherhood.

Some commentators suggest that pro-equality women who reject feminism are misguided. After all, the dictionary defines feminism as belief in the social, economic, and political equality of the sexes. But these women usually know that (and often sarcastically stress that they do). They simply think that real-life feminism has come to mean something else: vilification of men, support for female privilege, and a demeaning view of women as victims rather than free agents.

Are they wrong? Well, one of Women Against Feminism’s harshest critics, leading feminist pundit Jessica Valenti, makes it clear that being a feminist means believing that women in America and other modern liberal democracies are “a victimized class.” They are “systematically discriminated against in school, work, and politics,” “objectified,” and “harassed, attacked, and sexually assaulted.” This, Valenti asserts, is “not a matter of politics, but of truth.”

But contributors to Women Against Feminism disagree. They note that many studies show the pay gap to be largely due to women's choices of more family-friendly — and life-friendly — jobs. (As for school, American women have long outpaced men in educational attainment, currently earning about 60 percent of college degrees.) They take issue with rape statistics that lump alcohol-fueled, judgment-impaired sex with sexual assault. They argue that men face their own negative stereotypes. They point out that men are at higher risk than women for most violent crimes — and may be far more likely than previously thought to experience domestic violence and sexual coercion. They say that in many areas, from divorce to mental health to workplace safety, it's men who have it worse.

These arguments need to be engaged, not dismissed and ridiculed. Yet many feminists have responded with nastiness that would normally be called misogynist: In the New York Observer, Nina Burleigh focused on a few photos showing too much skin or black-polished fingernails to sneer that the women were “dressed and posed like ads for DIY escort services.”

Meanwhile, even as feminists deplore accusations of male-bashing, many are embracing “ironic misandry” (hatred of men). Valenti recently tweeted a picture of herself in a t-shirt declaring “I bathe in male tears.” Other examples include the mottoes “Ban Men” and “Kill All Men” and Internet jokes that turn book titles into castration one-liners. Feminist commentators such as Slate.com's Amanda Hess defend this practice as a cool in-joke that annoys sexists and mocks the idea that feminists are anti-male.

But aside from the fact that cliquish in-jokes are off-putting and “ironic” hate can still sound pretty hateful, the “misandry” joke falls flat because there are too many real-life examples of feminist anti-male bias. The National Organization for Women has fought against more rights for divorced fathers, often suggesting that men who advocate for such rights are abusers. Feminist groups urging stronger enforcement of domestic violence laws have cried foul when such tough policies have led to more arrests of women. Anti-rape activists have championed campus rules that brand the man an attacker and the woman a victim if they have sex while equally intoxicated.

Women Against Feminism is largely a reaction against this mindset. The anti-feminist egalitarians believe that, whatever feminism's positive past gains, its dominant modern version is hostile to men and demeaning to women. They are right.

I don't like the “anti-feminism” label because of its common meaning of “anti-woman” or “anti-equality.” But, call it reformed feminism or egalitarianism, we need a movement for true equality — against both old-fashioned sexism and new gender polarization.

Cathy Young is a columnist at Newsday and RealClearPolitics.com. Follow her on Twitter [@CathyYoung63](#).

Exhibit B

News

Tory Shepherd

Shepherd: Men's rights extremists go online

- by: *Tory Shepherd*
- From: *The Advertiser*
- January 10, 2012 12:00AM



Men's rights extremists typically see middle-aged, straight, white males as the new oppressed.
Picture: Paul Burston *Source: The Advertiser*

THERE'S a movement that sees males - generally straight, middle-aged, white males - as the new oppressed. Seriously.

Men's activists have been around for decades, but thanks to the internet they're getting slicker, more organised, more professional, and more visible.

Men's outcomes in some areas really are poor. Male suicide rates are three to four times higher, their life expectancy is lower. Girls often outperform boys at school. Males are more likely to be incarcerated, more likely to be addicted.

But these genuine issues are not the ones that concern the new breed of men's activists. These men are aggrieved because they see misandry - the hatred of males - everywhere in society, from government down.

They have a persecution complex, and aggressively lobby for better rights for men - usually at the expense of women.

Take a bunch of these men's rights activists, blend with fathers' rights groups, add a searing sense of injustice and a healthy dollop of rage, and serve it up online.

In the paranoid words of one popular men's rights blog: "We aren't simply a protest movement anymore, we're going to have to shift to a war mentality".

The same site, A Voice for Men, recently published an article called "A path to Australian apartheid", which outlines how feminists have infiltrated government to spread their ideology and exclude men.

The site compares "feminists, manginas, white knights and other agents of misandry" to clansmen, skinheads and neo-Nazis.

The core claims of the men's rights extremists include:

Women have never been worse off than men - this is a feminist lie and is part of the plot to subjugate men.

Women are all gold-diggers who use marriage and divorce to extort money from men.

Family law courts let women legally steal children from men, and let women get away with false accusations of child abuse.

Women routinely falsely accuse innocent men of rape.

Domestic violence statistics are warped; men are victims as much as women and women make false claims about violence in courts that are too inclined to believe them.

One prominent men's movement go-to guy, "Angry Harry", also says feminism is to blame for traffic congestion and global warming.

Over at The Punch we're devoting a series of articles to debunking each of these claims (although to be honest we probably won't bother with the traffic congestion and global warming stuff).

These false claims are not just sinister ideas confined to the interwebs - they're calls to action. Men's Rights Extremists are actively lobbying to change Australian laws. They are spreading misinformation and trying to discredit good policies and good programs.

For example, they were recently up in arms about White Ribbon Day - the campaign to stop violence against women.

The MREs see it as a feminist plot to portray all men as abusers. They also claim the statistics on violence against women are grossly exaggerated. Dr Michael Flood, White Ribbon Ambassador and expert on men and gender issues, has written extensively on "men's rights" men.

He says the internet has transformed them and allows them to appear a "massive horde" out of proportion to their actual numbers.

But that doesn't mean their bark is worse than their bite. Dr Flood says they have already influenced family law, government policy and community attitudes, subtly shifting the balance to better protect perpetrators and discredit victims.

Online, everyone, to some extent, is equal, and men's rights extremists eloquently bend statistics and anecdotes to underline their arguments. They provide a heady, toxic mix of bitter, self-righteous fury.

There aren't many places for men who feel they've been burnt by the family law courts or the justice system to seek succour.

The MRE world is a place for these wounded, angry men to come together and foment trouble.

-- shepherd@thepunch.com.au

Exhibit C

THE ADVERTISER

NEWS

Lecturers in world-first male studies course at University of South Australia under scrutiny

- POLITICAL EDITOR TORY SHEPHERD
- THE ADVERTISER
- JANUARY 12, 2014 8:08PM

LECTURERS in a "world-first" male studies course at the University of South Australia have been linked to extreme views on men's rights and websites that rail against feminism.

The lecturers' backgrounds are likely to spark controversy, but organisers of the predominantly online course, promoted as the first of its type in the world, insist they are not anti-feminist and "it's very difficult for anybody who has opposing views to get a word in".

Two lecturers have been published by prominent US anti-feminist site A Voice for Men, a site which regularly refers to women as "bitches" and "whores" and has been described as a hate site by the civil rights organisation Southern Poverty Law Centre.

The US site specifically welcomed the UniSA course as a milestone, editor Paul Elam saying it marked the end of feminists' control of the agenda.

One American US lecturer - US attorney and self-professed "anti-feminist lawyer" Roy Den Hollander - has written that the men's movement might struggle to exercise influence but that "there is one remaining source of power in which men still have a near monopoly - firearms".

He also argues that feminists oppress men in today's world and refers to women's studies as "witches' studies".

Another, US psychology professor Miles Groth, says that date-rape awareness seminars might be deterring men from going to university.

Mr Den Hollander has tried to sue ladies' nights for discrimination against men. He has likened the position of men today to black people in America's south in the 1950s "sitting in the back of the bus", and blames feminists for oppressing men.

The course, which has no prerequisites, begins this year and will canvass subjects from men's health to gender bias.

Course founder Gary Misan, from UniSA's Centre for Rural Health and Community Development, said they were "not anti-women" and that lecturers were associated with a range of groups.

"I wouldn't say any of them are extreme or anti-feminist," Dr Misan said.

"The aim of the courses are to present a balanced view and to counter some of the negative rhetoric that exists in society in general and in some areas of academe about men.

"It's very difficult for anybody who has opposing views to get a word in. As soon as somebody mentions anything they perceive as being anti-feminist, they're pilloried, and in some cases almost persecuted."

Dr Misan also said that writing something for a specific website did not necessarily suggest an affiliation.

Dr Michael Flood, from the University of Wollongong's Centre for Research on Men and Masculinity, said these types of male studies "really represents the margins".

"It comes out of a backlash to feminism and feminist scholarship. The new male studies is an effort to legitimise, to give academic authority, to anti-feminist perspectives," he said.

Flinders University School of Education senior lecturer Ben Wadham, who has a specific interest in men's rights, said there was a big difference between formal masculinity studies and "populist" male studies.

He said there were groups that legitimately help men, and then the more extreme activists.

"That tends to manifest in a more hostile movement which is about 'women have had their turn, feminism's gone too far, men are now the victims, white men are now disempowered'," he said.

"I would argue that the kinds of masculinities which these populist movements represent are anathema to the vision of an equal and fair gendered world."

Dr Wadham said that universities needed to uphold research based traditions instead of the populist, partisan approach driven by some.

Men's Health Australia spokesman and Male Studies lecturer Greg Andresen is also the Australian correspondent for US-based site *National Coalition For Men*, which declares false rape accusations to be "psychological rape", argues that talking about violence against women makes men invisible.

Asked about his connection to NCFM, he said they were the longest-running organisation in the world to look at discrimination against men and boys.

"Certainly they don't shy away from touching issues like false rape allegations, domestic violence, some of those hot topics," he said.

"We have had 20 if not 30 or 40 years where the only study on gender has been from a feminist perspective ... that's why I think this course is so long overdue," he said.

UniSA's Provost and Chief Academic Officer, Professor Allan Evans, said the courses covered important men's health issues and would equip allied health professionals who deal with men's health.

"All new courses are reviewed thoroughly prior to being offered to ensure they are suitable and beneficial to our students," he said.

Exhibit D

Sydney Morning Herald National

University of South Australia distances itself from males studies proposals

Date January 14, 2014



Amy McNeilage

Reporter

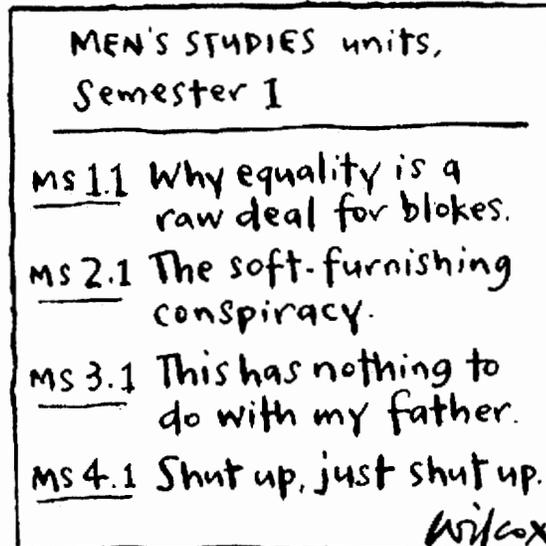


Illustration: Cathy Wilcox

The University of South Australia has distanced itself from a proposal for a series of male studies courses, some of which were to be taught by hardline anti-feminist advocates.

The university has approved one of four proposed graduate courses, a certificate in male health and health promotion, which will begin online next month.

But an original proposal by one of the university's academics outlined three further certificates, including a course called "males and sexism", which named lecturers who have been published on radical men's rights websites.



American lawyer and self-described anti-feminist: Roy Den Hollander. *Photo: Supplied*

Among those named was American lawyer and self-described anti-feminist Roy Den Hollander, who filed a lawsuit against Columbia University for offering women's studies courses that preached a "religionist belief system called feminism", *The New York Times* reported in 2008.

Advertisement

Another proposed lecturer, Miles Groth from Wagner College in New York, wrote on the New Male Studies Facebook page on Sunday: "Two years of preparation and the support of the university from the start now seem to be jeopardy because of unnamed critics making erroneous accusations. It has been known for some years now that academe is held hostage by radical ideological feminists in the humanities and social sciences, and administration, who fear them."

The university emphasised it did not endorse views of the suggested lecturers. It said the courses, which were criticised in the media on Monday, were rejected in 2012.

Any future courses would need to go through the same approval process, a spokeswoman said.

But National Union of Students president Deanna Taylor said it was concerning that the academic who founded the course, Associate Professor Gary Misan, was linked to the controversial Americans.

"It's a slippery slope once you open the door to people with these views and give them a platform ... it's not long before proposals like the ones that were rejected actually get approved," she said.

Feminist academic Eva Cox said it was probably time to take a good look at how assumptions about gender constrain both men and women:

"Whether we need to run a university course on them, I've got my doubts," she said. "The only reason I can see that you'd be running men's studies is for the men who want to complain that they haven't had enough attention as victims, and that does worry me.

"Yes, some men have difficulties with going to doctors ... but I think we need to look at the assumptions about masculinity and femininity and how they trap both genders rather than picking on one or the other."

Exhibit E

HERALD SUN

NATIONAL NEWS

University of South Australia gives controversial Male Studies course the snip

- TORY SHEPHERD POLITICAL EDITOR
- THE ADVERTISER
- JANUARY 14, 2014 11:15AM

CONTROVERSIAL aspects of a Male Studies course will not go ahead, the University of South Australia says - though lecturers involved with it still believe that it will.

The Advertiser revealed yesterday that some of the lecturers listed for the professional certificates had links to extreme men's rights organisations that believe men are oppressed, particularly by feminists.

The university yesterday said two short courses that would cover male health and health promotion programs targeting males had been approved, that "no other courses have been approved" and that only university staff would teach the courses.

Over the past two days, *The Advertiser* has spoken to several lecturers who believe the remainder of the proposed courses - on topics including gender bias and male power and privilege - are set to go ahead. An information sheet on the Male Studies course said it would be considered "if there is sufficient interest".

US "anti-feminist" lawyer Roy Den Hollander said yesterday that he was preparing a course that looked at how the law favours females when it comes to employment, crime, domestic relations, property, divorce and illegitimate children.

"The course is really looking back at 200 or 300 years of history and how the law treated guys and girls - and it treated girls more favourably than guys and it still does, maybe even more so.

Mr Den Hollander also stood by his claim that men's remaining source of power was "firearms". Asked whether he thought that was "extreme", he said that it was true that it was "really the only area that they control in society now".

He said that even where men dominate areas such as boards and politics, they are still enforcing the belief system of feminism.

However, Mr Den Hollander is unlikely to be able to tell Adelaide students about similarities he sees between the men's rights movement and the civil rights movement, as the university says the subject he is down to teach was never approved.

A statement from the university issued yesterday said only UniSA staff would develop and teach courses, and that the university did not "endorse or support the controversial comments on gender issues" revealed in yesterday's *Advertiser*.

Yesterday men's rights activists attacked criticism of the course as lies, corruption and fascism.

"As we know, feminist ideologues are well placed with the luxury of great control. But while this is clearly an exercise in their power, it is an exercise in power that is waning," Paul Elam, editor of the anti-feminist site A Voice For Men wrote, adding the "only way forward" was "straight through them".

National Union of Students president Deana Taylor said a course like that proposed for the university provided "a dangerous platform for anti-women views".

Exhibit F

NEWS

Men's rights campaigner Roy Den Hollander attacks *The Advertiser's* Tory Shepherd in bizarre legal writ filed in New York County

TORY SHEPHERD THE ADVERTISER JUNE 18, 2014 2:15PM

ROY Den Hollander calls me a female-dog-in-heat reporter and a harpy, and says if feminists are hot, they can walk all over him in their stilettos.

Which isn't all that interesting in and of itself, except this is the guy who wanted to teach the men of South Australia about their position in the world.

After *The Advertiser* revealed UniSA was planning a course in men's studies that included men with links to US men's rights extremists, the course was canned.

Well, according to the university it was never formally approved, although there was a course list in existence and certainly Mr Den Hollander thinks he was in line to be paid \$1250 to lecture.

His subject was going to be about how the law discriminates against men and in favour of women.

See, Mr Den Hollander is a proudly "anti-feminist" lawyer with a fairly unsuccessful track record.

Most famously, he lost a court case where he tried to sue nightclubs for hosting ladies' nights – alleging they discriminated against men by giving women cheaper or free drinks or entry.

Now Mr Den Hollander is suing me (as the political editor of the "online newspaper *The Advertiser-Sunday-Mail-Messenger*) and Fairfax journalist Amy McNeilage from his home base of New York County.

■ WATCH: THE COLBERT REPORT ON ROY DEN HOLLANDER

So this is now the subject of legal action – from the land where free speech is in the Constitution.

So I probably can't bang on too much. But Mr Den Hollander, representing himself, has penned a legal document (handed over to *The Advertiser* by a sheriff – who knew we had sheriffs?) that cannot remain between me and my lawyer. It's gold and genius like this should be shared.

So with no further ado, here are some lessons from Mr Den Hollander, who will not be paid to give lessons at UniSA:

Lesson 1: How to censor a journalist by accusing them of censorship.

“Two modern-day, book-burning, Bacchae reporters from down-under authored and published false and misleading information concerning Plaintiff (Den Hollander) with the intent and result of harming his economic interests and interfering with a prospective economic advantage by causing the University of SA to incinerate the section of a proposed male studies course that Plaintiff would have taught,” he writes. But wait.

Lesson 2: How to personally attack a journalist by accusing them of personal attacks.

“The two reporters, Tory Shepherd, AKA “Tory the Torch” for *The Advertiser* and Amy McNeillage, AKA “Amy McNeuter” for *The Sydney Morning Herald*, used their power as reporters to do what weak-minded ideologues have done throughout history — employ personal attacks to prevent the spread of knowledge and ideas that they disagreed with.”

Lesson 3: How to prove you are not an extremist by sounding like an extremist.

“If these two feminist book-burners had not jumped on their broomsticks and scared the bejesus out of the administrators of the University of SA, students there would have had an opportunity to acquire information and consider views not available anywhere else in higher education.”

Brilliant, no?

Mr Den Hollander goes on to argue that the “psychological-bacchanalian frenzy” was “yellow, female-dog-in-heat reporting” that somehow created the impression that he was “evil and should figuratively, if not literally, have his tongue cut out”. And questions where I “ever uttered a disparaging word about men when going through the trouble of maintaining blonde hair at (my) age”. Whatever that means.

“Thank goodness for Australians that Tory was not around for Australia’s battle against the Japanese. Her anti-gun advocacy for men might have even resulted in her and Amy ending up as Japanese ‘comfort girls’,” he writes.

He also talks of his concern that “alien wives and girlfriends” are making up phony abuse cases against men, and that men are being targeted by feminists because they were trying to escape said feminists by going overseas for girlfriends.

Guys don’t get off scot-free, though – he also has a crack at “girlie-guys”. In the men’s rights vernacular, “girlie-guys” are usually known as “manginas”. The terms refer to males who

believe in equality for women – in Mr Den Hollander’s words: “girlie-guys who hope that by being sycophants, they can avoid being hexed by the feminists”.

It’s at about this point that I start to wonder: Why on Earth give such a man more publicity?

But it’s important, I think, to remain aware and wary of people like Mr Den Hollander.

I suspect the people at UniSA who flirted with the idea of bringing him over to teach may not have really understood his philosophy.

I also wanted to use this opportunity to put on the public record that I may be a harpy, and somewhat bacchanalian, but I never, ever wear stilettos.

Exhibit G

'Carnivorous men' versus 'lying bitches' in sex war

By [Catherine Snow](#) and [Catherine Snow](#)

Updated 12:00pm AEST 12/01/2017

[View on ABC News](#) [View on ABC News](#)

- Hate site's motto is 'F***king their s**t up'
- Linked to site to name, shame "bitches"
- Canning says its a rare place for men
- The Punch on the SCUM Manifesto



An academic stoush between Associate Professor Betty McLellan and Dr Greg Canning has exposed the dark recesses of the gender wars. Source: Townsville Bulletin

An academic stoush has exposed the dark recesses of the gender wars. On one side are radical feminists who see men as "carnivorous and necrophiliac" and on the other side are men's rights extremists who see women as "lying bitches" who routinely make false rape accusations.

The Townsville Bulletin revealed last week that Dr Greg Canning quit his James Cook University post in protest because they refused to discipline his feminist colleague Dr Betty McLellan for writing an article which he thought stereotyped all men as sexual abusers.

Dr McLellan wrote on radical feminist website RadFem Hub that in light of male violence and rape we should be asking ourselves what it is about men that leads to these behaviours. Dr Canning said the article painted all men as evil, but the university declined to take any action.

Now it turns out Dr Canning is the Australian news director of a US hate site that claims men have almost no legal rights and should shift to a "war mentality" because women now have "supreme power".

Dr Canning works for A Voice for Men. AVFM's claims include that there is an "epidemic" of false rape accusations, that rape and domestic violence awareness campaigns are examples of "male sex witch hunting", and that women, literally, get away with murder.

The site's motto is "FTSU" which stands for 'F***king their s**t up' in reference to feminists, and it is closely connected to a site called "Register Her" to name and shame women who are "lying bitches" or bigots. For example, actor Katherine Heigl features on there under the heading "bigot" because she once made a joke about castration.

Dr Canning told News.com.au he disagreed with the tone of some sections of the website and that he did not agree with all the arguments on there, but that he believed it was a rare place where men could speak up.

He does, however, talk about false rape allegations on the site, a topic that is a core issue to AVFM. Men's rights extremists claim women often invent rape, either because they regret sex or because they want to frame men.

When questioned about another claim that there was a "corrupt" domestic violence "industry", Dr Canning said he believed that the domestic violence sphere was controlled by feminists who ignore violence against men. He then went on to attack Dr McLellan afresh, pointing out that the website she wrote on describes men as having "carnivorous and necrophiliac" behaviours.

RadFem Hub also warns about the dangers of "penis in vagina" sex and argues that men "as a class" are trying to destroy women.

Gender and violence expert Dr Michael Flood, a senior sociology lecturer at the University of Wollongong who has had disagreements with Dr Canning and men's rights activists in the past, said vitriol and extremism were rife online.

He said the false rape allegation claims were a standard way men's rights activists tried to discredit rape victims.

"It ends up disempowering victims and protecting perpetrators," he said, adding that false rape allegations were rare and likely made as often by men as by women.

Dr Flood also said the internet could be a dangerous place for women, particularly feminist women.

"The internet has provided a forum for more extreme and vitriolic beliefs and it has provided a forum where angry anti-feminist men can voice the most hostile and toxic kinds of attacks, particularly against feminist women," he said.

SOURCE: <http://www.news.com.au/national/carnivorous-men-v-lying-bitches-in-sex-war/story-e6frfkp9-1226427879838>

Exhibit H

NEWS

Tory Shepherd: Pathetic bid for victimhood by portraying women as villains

TORY SHEPHERD THE ADVERTISER JANUARY 14, 2014 11:04PM

IF you accuse a bunch of men's rights extremists of calling women whores and bitches, be prepared for them to deny they call women whores and bitches.

And then prepare for them to call you a whore and a ... well, worse.

Which is no big drama - I learned long ago what happens if you cross these guys. Besides, last week I was called ShortHairLargeArse and ButchHairBargeBum. Far more accurate insults, although my hair has really grown quite long lately.

But I'm pretty keen to go over some of the ground that's been covered this week after uncovering plans to have a Male Studies course at the University of South Australia.

Most of the courses now won't go ahead - the uni says they were never approved, while other materials they say were pending sufficient interest, and a swag of proposed lecturers seemed to think they were locked in.

READ MORE: Gillard 'treatment' a political turnoff

Big ups to UniSA for having the sense to reject anything linked to those at the very fringe of the men's rights spectrum, and instead focus on men's health, taught by their own lecturers, not overseas ring ins.

You'd think I'd shut up now the plans are off the table, but it's really important to get across the bigger picture. See, most people probably think that the men's rights guys I was talking about - the ones who habitually call women names, argue that they routinely make up rape, and put it about that women either incite their own domestic violence or are the abusers themselves - are just circle-jerk misogynists.

They are - misogynists, I mean. And we're talking old-school misogyny - the hatred of women - as well as the new-school misogyny - entrenched prejudice against women.

Not just harmless condescension or unthinking stereotypes, but some serious anger.

The problem is, the circle is no longer closed, no longer just a bunch of angry guys in a basement. They're trying to get up the stairs and into the light.

They want to play outside with legitimate experts in men's issues and male disadvantage.

It's a classic tactic, used by pseudoscientific fraudsters. Adopt the language of the actual scientists. Find odd reports and old stories, random statistics and shocking anecdotes, and stitch them into a Hannibal Lecter-style creation that mimics valid inquiry.

Try to sound like the real deal, and look enough like them to fool some people, some of the time.

The good news is most of them struggle to keep up the farce. Paul Elam, editor of *A Voice For Men*, which is the global hub of men's rights delirium, popped up on FiveAA yesterday and said it was a lie that his site referred to women as bitches. That is, in turn, a lie. Any doubters should just Google it.

I suspect that Mr Elam's defence, as it is entirely clear that he loves to call women names, that he thinks women sometimes are "begging" to be raped, that he scoffs at domestic violence and seems to think women deliberately provoke violence against themselves to somehow get at men, is rather piss weak.

Maybe he just uses those words to describe feminists. He may even follow his managing editor's line of logic. Dean Esmay, talking about *The Advertiser* story on how their site likes to call women whores and bitches, said yesterday:

"We do not regularly call women as a class whores or c**ts... we will on occasion call a woman, like Tory Shepherd or a man like (University of Wollongong lecturer) Michael Flood a whore, a c**t, or a bitch... yes, we use heated rhetoric."

Yes, they do use heated rhetoric, and they do bang on interminably about how hard done-by men are.

Not in the important areas of health, where men are behind, or even education, where the same thing is happening. Or suicide.

No, not because of that, but because they keep getting ripped off and attacked by crazy bitches and feminazis out to oppress them.

Poor boys, trying desperately to claim the mantle of victimhood. It would be pathetic if it wasn't for the fact that they are trying to make women into villains at the same time.

It could be dismissed if they weren't trying to creep in where they are not needed, or wanted. If they weren't trying to lobby for law changes or to brainwash people into thinking black is white.

The shades of grey, of course, are that sometimes men are victims - of domestic violence, of false rape accusations, of gold diggers.

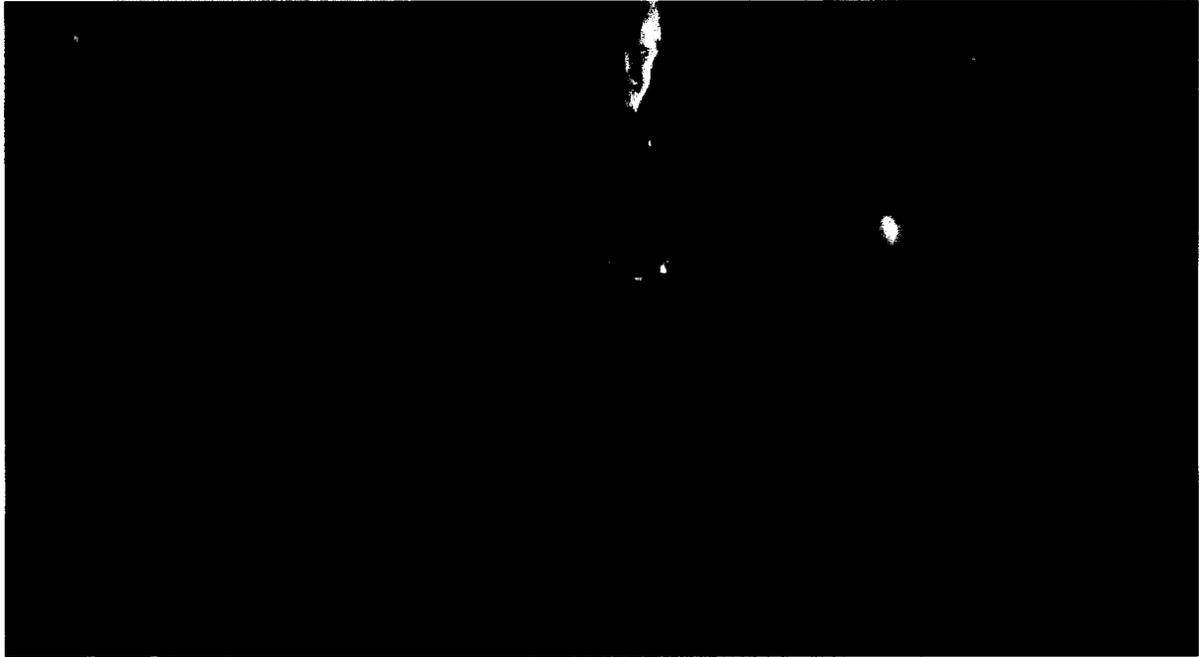
But these guys drown out any real discussion with their endless angry spittle. And that's the real bitch.

Exhibit I

Australian “Male Studies” initiative under fire because of its connections to raving misogynists; raving misogynists blame feminists

JAN 13

Post by David Futrelle



Antifeminist attorney, A Voice for Men contributor, and would-be Male Studies lecturer Roy Den Hollander bustin’ a move on the Colbert Report.

NOTE: See the end of the piece for an important clarification from the University.

So it seems the new “Male Studies” initiative at the University of South Australia is running into a few problems. Well, one big problem: members of the general public have discovered that some of the people involved with the initiative are raving misogynists, or have chosen to associate themselves with raving misogynists.

Yesterday, [a story](#) by journalist Tory Shepherd noted that two of the lecturers have written for a notoriously misogynistic website by the name of A Voice for Men. (You [may have heard of it.](#)) One of them, the [crankish American attorney Roy Den Hollander](#), even suggested in a post on that site that men’s rights activists may have to [take up arms](#) against the evil Feminists who run the world.

The future prospect of the Men’s Movement raising enough money to exercise some influence in America is unlikely. But there is one remaining source of power in which men still have a near monopoly—firearms. Huh. That doesn’t sound like a very *academic* analysis of the situation to me.

Den Hollander also likes to refer to “women’s studies” as “witches’ studies.” And if you don’t believe her, here’s the AVFM post [in which he does just that](#); it’s in the first sentence.

Apparently pointing out some of these basic facts about Den Hollander, and about another of the lecturers, Miles Groth, who has also written for AVFM, is causing some trouble for Dr. Misan and his little Male Studies initiative – at least according to a post on AVFM by the always furious Paul Elam, who informs us somberly that

[s]ources close to the story report that [Shepherd's article] is likely a terminal setback for the new initiative.

Elam fights back against Shepherd's alleged "lies" in a paragraph that is itself nothing but lies:

The article by Shepherd is saturated with the typical lies, e.g.: that the SPLC named AVFM as a hate group, which they did not, and that this website regularly calls women "bitches and whores," which it does not. She also implied a connection between AVFM and those championing the initiative which does not exist. Actually, Shepherd said that the SPLC described AVFM as a "hate site," not a "hate group." This is in fact true, as the SPLC included AVFM in a list of "woman-hating sites," which would make it a hate site, as the hatred of women is in fact a kind of hate.

And AVFM does in fact refer to women regularly as whores and bitches and other slurs. Indeed, in one notorious post about Rebecca Watson, Elam managed to use the word "whore" more than 30 times; as for the word "bitch," well, check out this compilation of AVFM posts featuring that word in the title. As you'll see from that post, Elam also likes referring to women as "cunts," and once referred to the feminist blogosphere as the "cunt-o-sphere."

Do your own searches for "whore" or "bitch" on AVFM to find more recent examples.

Shepherd doesn't, in fact, imply any "connection" between AVFM and "those championing the initiative" beyond the undeniable fact that two of the lecturers have written for AVFM, and that AVFM has heralded the Male Studies initiative. Interestingly, it's Elam, with his talk about "[s]ources close to the story," who implies an even closer connection than Shepherd does.

The rest of Elam's post is a remarkable mixture of self-contradicting lies and self-delusion. First, he declares "Male Studies" to be a pure-as-the-driven snow example of non-ideological scholarship.

In writing this article Shepherd actually served as a mouthpiece for academic feminists invested in blocking the attempt to study human males in a non-ideological, scholarly fashion.

How exactly is someone who describes himself explicitly as antifeminist, who describes women's studies as "witches studies," and who's written for AVFM on several occasions an example of someone who is trying "to study human males in a non-ideological, scholarly fashion?"

Elam then launches into one of his typical chest-beating fuck-their-shit-up ideological rants:

The Men's Human Rights Movement is not going to go away. Indeed, even as we regret the temporary setback of an important and valuable initiative, we do welcome another opportunity to shine a light on the ideologically twisted agenda of people who would undermine an academic program with the ambition to enhance our understanding of an egregiously underserved population.

Yes, that's right. The world's men have been "egregiously underserved."

This type of bullying and public deception is precisely what has catapulted the Men's Human Rights Movement into rapid growth and increasing popularity in such a short period of time.

The only bullying and deception I'm seeing here is coming from your side, dude. Women aren't talking about taking up arms against men. You're the one who's lying about what Shepherd said.

From assaultive, criminal demonstrators in Toronto blocking doors to a lecture on male suicide, to this - an obviously orchestrated attack on honorable academicians – the reality of what feminism has become, and the depths to which it has lowered, is again in full public view.

Uh, Roy Den Hollander isn't an "honorable academician." And, frankly, neither is anyone who chooses to associate themselves with your site. I'm not sure how Shepherd's one article counts as an "obviously orchestrated attack," but all she did was point out what Hollander said, and point out the sort of misogynistic shit you publish on your shitty website.

In other words, Mr. Elam, you guys have dug your own hole here – with you, personally, bringing one of the bigger shovels.

Just think: A Voice for Men may be in large part responsible for the collapse of this Male Studies initiative, because you and the others writing on your site can't hide your raging misogyny, and can't resist the temptation to call women "bitches" and "whores."

This is the lesson of all the publicity you guys have gotten in the last year: when members of the general public learn what you guys actually believe, they are repulsed by it. The more attention you get, the more people oppose you.

After some more ranting that he might as well have cut and pasted from any of a dozen previous posts of his, Elam ends with one of his trademark vague threats:

We will force their hand, again and again. And each time they demonstrate their moral bankruptcy; their limitless capacity for tyranny, the more they will generate the contempt and indignation they deserve. And the more people will realize that the only way forward is straight through them.

You're just digging that hole deeper.

EDITED TO ADD: The University of Southern Australia has clarified a few things about the Male Studies initiatives. According to [a piece in the Sydney Morning Herald](#), the school *only approved one of the four proposed courses*, and officially *rejected* (back in 2012) the one that would have included Den Hollander and Groth as lecturers. Here's what the newspaper says:

The university has approved one of four proposed graduate courses, a certificate in male health and health promotion, which will begin online next month.

But an original proposal by one of the university's academics outlined three further certificates, including a course called "males and sexism", which named lecturers who have been published on radical men's rights websites. ...

The university emphasised it did not endorse views of the suggested lecturers. It said the courses, which were criticised in the media on Monday, were rejected in 2012.

So that's reassuring to hear.

I removed a portion of my post referring to Gary Misan, in charge of the course, because in light of this information it's not clear if he was referring to all four courses, including those involving Den Hollander and Groth, or just to the male health course.

Oddly, though, Dr. Misan seems to think that the University has signed up for more than one course. On his [official University of South Australia web site](#) he describes himself as “program co-ordinator for a new suite of courses in Male Studies at UniSA, the first of which will be offered in 2014.”

Exhibit J

Follow



ToryShepherd Verified account @ToryShepherd

Harpy, dog-in-heat bacchanalian reporter. Nicest thing anyone's ever said about me. Tomorrow's column [@thetiser adelaidenow.com.au/news/opinion/m...](https://www.thetiser.adelaidenow.com.au/news/opinion/m...)

.....

- Reply
- Retweet
- Favorite
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Exhibit K



General Statement of Principles

To assist the public and the press, the Australian Press Council has laid down the broad principles to which it is committed.

First, the freedom of the press to publish is the freedom, and right, of the people to be informed. These are the justifications for upholding press freedom as an essential feature of a democratic society. This freedom includes the right to publish the news, without fear or favour, and the right to comment fairly and responsibly upon it.

Second, the freedom of the press is important more because of the obligation it entails towards the people than because of the rights it gives to the press. Freedom of the press carries with it an equivalent responsibility to the public. Liberty does not mean licence. Thus, in dealing with complaints, the Council will give first and dominant consideration to what it perceives to be in the public interest.

The Council does not lay down rules by which publications should govern themselves. However, in considering complaints, the Council will have regard for these general principles.

General Principle 1: Accurate, fair and balanced reporting

Publications should take reasonable steps to ensure reports are accurate, fair and balanced. They should not deliberately mislead or misinform readers either by omission or commission.

General Principle 2: Correction of inaccuracy

Where it is established that a serious inaccuracy has been published, a publication should promptly correct the error, giving the correction due prominence.

General Principle 3: Publishing responses

Where individuals or groups are a major focus of news reports or commentary, the publication should ensure fairness and balance in the original article. Failing that, it should provide a reasonable and swift opportunity for a balancing response in an appropriate section of the publication.

General Principle 4: Respect for privacy and sensibilities

News and comment should be presented honestly and fairly, and with respect for the privacy and sensibilities of individuals. However, the right to privacy is not to be interpreted as preventing publication of matters of public record or obvious or significant public interest. Rumour and unconfirmed reports should be identified as such.

General Principle 5: Honest and fair investigation; preservation of confidences

Information obtained by dishonest or unfair means, or the publication of which would involve a breach of confidence, should not be published unless there is an over-riding public interest.

General Principle 6: Transparent and fair presentation

Publications are free to advocate their own views and publish the bylined opinions of others, as long as readers can recognise what is fact and what is opinion. Relevant facts should not be misrepresented or suppressed, headlines and captions should fairly reflect the tenor of an article and readers should be advised of any manipulation of images and potential conflicts of interest.

General Principle 7: Discretion and causing offence

Publications have a wide discretion in publishing material, but they should balance the public interest with the sensibilities of their readers, particularly when the material, such as photographs, could reasonably be expected to cause offence.

General Principle 8: Gratuitous emphasis on characteristics

Publications should not place any gratuitous emphasis on the race, religion, nationality, colour, country of origin, gender, sexual orientation, marital status, disability, illness, or age of an individual or group. Where it is relevant and in the public interest, publications may report and express opinions in these areas.

General Principle 9: Publication of Council adjudications

Where the Council issues an adjudication, the publication concerned should publish the adjudication, promptly and with due prominence.

Note 1 "Public interest"

For the purposes of these principles, "public interest" is defined as involving a matter capable of affecting the people at large so they might be legitimately interested in, or concerned about, what is going on, or what may happen to them or to others.

Note 2 "Due prominence"

The Council interprets "due prominence" as requiring the publication to ensure the retraction, clarification, correction, explanation or apology has the effect, as far as possible, of neutralising any damage arising from the original publication, and that any published adjudication is likely to be seen by those who saw the material on which the complaint was based.

Exhibit L

The Advertiser Code of Conduct

The policy of our publications across all platforms

This policy applies to News Limited and its editorial employees in both print and digital media platforms. It is an update of the News Limited Professional Conduct Policy which applies to editorial employees of News NSW; News Victoria, News Queensland, Davies Bros Limited, Advertiser Newspapers Limited and the regional and suburban newspaper and operations around Australia.

News Limited group publications aim for the highest editorial and ethical standards.

Editorial employees and contributors should be open-minded, be fair and respect the truth.

To this end, all staff need to be familiar with the policy detailed in the following pages, to follow the rules they contain, and to apply their underlying principles.

1. Accuracy

1.1 Facts must be reported impartially, accurately and with integrity.

1.2 Publications should take reasonable steps to ensure reports are accurate, fair and balanced.

1.3 Clear distinction must be made between fact, conjecture, comment and opinion.

1.4 Try always to tell all sides of the story in any kind of dispute. Every effort must be made to contact all relevant parties.

1.5 Do not knowingly withhold or suppress essential facts.

1.6 Journalists should not rely on only one source. Be careful not to recycle an error from one reference source to another.

1.7 Direct quotations should not be altered except to delete offensive language, protect against defamation, or to make minor changes for clarity.

1.8 Headlines and captions must reflect the tone and content of the article

1.9 Reports of new drugs or medical treatments must be considered with great caution. It is easy to raise false hopes or alarm among readers.

1.10 Information sourced from social media must be verified and checked for accuracy before publication on any platform.

1.11 Editors must be informed of photographs sourced from social media sites.

1.12 Images prepared for publication must meet the guidelines of the Photographic Enhancement and Manipulation policy, outlined below in Section 18.

2. Mistakes

2.1 Serious factual errors should be corrected at the first opportunity, subject to legal advice where appropriate, and corrections should be given due prominence. Individuals or organisations that have been criticised in News group publications should be given a fair opportunity to respond.

2.2 News Limited supports self regulation in the newspaper industry and participates in the activities of the Australian Press Council. Editors must publish prominently and promptly all Council adjudications on complaints by the public in respect of their newspapers.

2.3 All mastheads must publish prominent and permanent details in print and online that advise how to contact the publisher re concerns about content; how to contact the Council; how to access the standards of News Limited and of the Council. As well, all publications must publish a permanent column/section in print and online that deals with corrections and readers' right of response.

3. Misrepresentation

3.1 Do not use false names when representing a News Limited publication.

3.2 Do not try to get information or photographs by deception.

4. Privacy

4.1 All individuals, including public figures, have a right to privacy. Journalists have no general right to report the private behaviour of public figures unless public interest issues arise. The right to privacy diminishes when the suitability of public figures to hold office or perform their duties is under scrutiny and such scrutiny is in the public interest.

4.2 Unless it is in the public interest to do so, do not identify the family or friends of people accused of, or convicted of, a crime.

4.3 The publication of sensitive personal information — such as taxation details, Family Court records and health and welfare matters — may be prohibited by legislation. Seek legal advice.

4.4 Private investigators will not be contracted to provide editorial services without the approval of the group editorial director.

4.5 Private investigators conducting work on behalf of the company will be required to comply with our editorial code of conduct and provide a written assurance that they will not engage in unlawful surveillance.

5. Covert activities

5.1 Journalists and photographers may at times have to operate to expose crime, significantly anti-social conduct, public deception or some other matter in the public interest. All such operations must be approved in advance by the divisional head and the group editorial director. This approval will be given only where good cause exists to suspect crime or deception has taken place, and after all other means of gathering the facts have been exhausted. The group editorial director must be satisfied that the importance of publishing the information sought outweighs any damage to trust and credibility which your newspaper might suffer by allowing employees to operate surreptitiously. Where appropriate, the nature and reasons for operating covertly should be disclosed to readers.

5.2 Rules surrounding permission to tape telephone conversations differ between states. Seek specific legal advice as pertains to your state before taping any conversations. Be aware that approval must be sought if recording is to be used as audio in any online capacity.

6. Confidential sources

6.1 The sources of information must be identified, wherever possible. When an informant insists on anonymity, verification of the information offered must be sought from other, preferably attributable, sources.

6.2 A promise of confidentiality to a source must, of course, be honoured. However, journalists must be aware of the possible consequences. For example, a judge may order the source to be identified. Defiance of this order could lead to conviction for contempt of court, with the consequence of being imprisoned or being sanctioned with a heavy fine.

7. Harassment

7.1 Do not harass or try to intimidate people when seeking information or photographs.

7.2 Do not photograph people on their property without their consent unless the public interest in doing so is clear.

7.3 If asked to leave private property, do so promptly.

7.4 Do not persist in telephoning, pursuing, questioning, door-stopping or obstructing access after you have been asked by an authorised person to stop.

8. Discrimination

8.1 Do not make pejorative reference to a person's race, nationality, colour, religion, marital status, sex, sexual preferences, age, or physical or mental capacity. No details of a person's race, nationality, colour, religion, marital status, sex, sexual preferences, age, or physical or mental incapacity should be included in a report unless they are relevant.

9. Grief and distress

9.1 Reporters and photographers must always behave with sensitivity and courtesy toward the public, and in particular towards those involved in tragic events. No one should be put under pressure to be photographed or interviewed. Initial approaches might best be made through friends or relatives. We should respect the wishes of the bereaved or grieving.

9.2 Do not go into non-public areas of hospitals, welfare institutions, funeral parlours, churches, etc, without identifying yourself or without permission of the people affected or their intermediaries, subject to the conditions of covert activity outlined above.

9.3 Maintain sensitivity when recalling tragedy or crime.

10. Children

10.1 Extreme care should be taken that children are not prompted in interviews, or offered inducements to cooperate.

10.2 Do not identify children in crime and court reports without state specific legal advice.

10.3 Do not approach children in schools without the permission of a school authority.

11. Suicide

11.1 Do not reveal graphic details of a suspected suicide. Avoid making judgements about the method of death which suggest suicide is an acceptable means of resolving problems, particularly among young people.

11.2 Do not report details of method and location of a suicide unless the public interest in doing so clearly outweighs the risk, if any, of causing further suicides.

11.3 Do not sensationalise, glamorise or trivialise suicides.

11.4 Adopt special sensitivity and moderation in gathering and reporting news to mitigate harm or hurt to all of those affected by suicide or attempted suicide, including the person themselves and their family.

11.5 Where possible, include in such reports the contact number of support groups where people with problems may seek help.

12. Illegal drugs

12.1 Do not report recipes for drug manufacture details of distribution or descriptions of the use of other harmful substances unless justified by public safety considerations or at the request of authorities.

13. Weapons and threats

13.1 Do not report threats to use bombs or other weapons or threats of extortion unless public safety justifies it, or when the authorities request you to do so, or when it is necessary to explain public disruption caused by the authorities' reaction to such a threat.

13.2 Do not report details of the manufacture or methods of using explosives, ammunition, firearms, fireworks, crossbows, booby traps or any potentially lethal device.

14. Payment for information

14.1 Payment must not be made for interviews or information. In the event that a demand for payment or other form of reward or compensation is made, agreement must not be given without the group editorial director's approval.

14.2 The same principle applies to payments to criminals and their families and associates, witnesses in criminal proceedings and their families and associates.

15. Personal gain

15.1 Employees must not request or accept any money, travel, goods, discounts, entertainment or inducements of any kind outside the normal scope of business hospitality.

15.2 Bribes are to be rejected promptly and the managing editor and divisional head informed immediately.

15.3 Only the managing editor, editorial director or a nominee is authorised to accept offers of free or discounted travel, accommodation etc on behalf of a publication.

15.4 The managing editor has the absolute right to decide whether to accept an offer, who should be assigned and whether a report is published as a consequence. These conditions must be made clear to whoever made the offer.

15.5 Gifts of cash (any sum) are never acceptable.

15.6 Employees must never solicit or request any gift or benefit for themselves or anyone else in connection with their employment.

15.7 Employees must never solicit discount travel or accommodation for themselves; nor misrepresent their role within News in order to secure any form of travel discount or accommodation. Any travel provided free of charge by non-News Ltd companies must be approved prior to any commitment being entered into. All international travel must be approved in advance by the group editorial director.

15.8 Employees must never use their employment with News Limited as a means of gaining any form of entitlement or benefit from a commercial organization.

15.9 Employees must not accept personal gifts above a nominal value of \$100. If a gift has more than a nominal value, it may only be accepted following approval of the relevant departmental manager or editorial executive.

16. Financial reporting

16.1 It is illegal for employees to make personal gain from financial information received in advance of general publication. It is illegal to pass this information to others.

16.2 Journalists must not write about shares, securities or companies in which they, their family or friends, have a financial interest without disclosing that interest to the editor.

16.3 A declaration of interest must be made if journalists have traded or intend to trade, directly or indirectly, in shares or securities about which they have written recently or intend to write soon.

16.4 Journalists should not write about prospectuses prior to their lodgment without confirming that regulations of the Australian Securities Commission are not breached.

17. Plagiarism

Plagiarism is theft.

18. Photographic enhancement and manipulation policy

18.1 Images prepared for publication should meet the following guidelines. It is the responsibility of staff to produce true and accurate representations for publication. The credibility of our photographs is all important to the integrity of our newspapers and online sites. Enhancement of photographs is acceptable. However, this should be limited to simple procedures which improve reproduction quality, ie; auto enhancement.

18.2 Colour alteration, over sharpening and image manipulation is prohibited.

18.3 Subject to Clause 1, wire services pictures and images bought from non-News Group sources must not be altered except where an editor or the most senior editorial executive on duty deems it necessary to delete matter which might cause offence. Picture sources should be credited and any alteration explained in the caption.

18.4 Freelance, occasional and on-the-spot contributors must give an undertaking in writing that their pictures have not been altered. Except in special circumstances and on approval of the editor or the most senior editorial executive on duty, the source should be credited in the caption.

18.5 Any image that has had the subject altered or added to should be clearly acknowledged in the caption as “ Digitally Altered Image ”.

18.6 Images that News Limited companies sell for publication or private sales must be offered without electronic manipulation subject to clause 1.

18.7 Pictures by staff photographers being published in News Limited publications may be altered to achieve special effects or for artistic purpose, but only with the approval of the editor or the most senior editorial executive on duty. Pictures so treated must carry a warning in the captions explaining that the image has been altered when they are published or transmitted interstate or overseas.

18.8 Any special image that requires archiving and has been altered must be clearly marked to this effect before being archived and an original filed.

19. Interviews/Requests for information or documentation in third party litigation

19.1 In general, News Limited expects employees and contributors to co-operate with the authorities in investigations. However, requests by police or other authorities for work-related interviews must be referred to the managing editor and divisional head.

19.2 No employee of News Limited should speak in that capacity to another media organisation or at a public event without permission of the state editorial director or managing editor. (See the External Media policy guidelines below).

20. Advertising

20.1 Editorial material created as a condition of placing an advertisement (i.e. for favourable consideration) must carry a clear label at the top of the page, or directly above an isolated item: “advertisement”, “advertorial” or “advertising feature”.

20.2 Where possible, news stories which inadvertently relate to an advertisement, or advertiser, should not be carried on the same page.

21. Conflict of interest

21.1 A conflict of interest arises when personal interests or divided loyalties interfere with the ability to make sound, objective business decisions on behalf of the company. Staff may join and participate in any lawful political or community organisations or activities but must avoid any potential conflict of interest with their employment, and notify the editor if such a potential exists;

21.2 The editor must be made aware as soon as possible if a reporter is assigned to a story that presents a possible or real conflict of interest. Employees have an obligation to report potential personal conflicts of interest to the editor and managing editor.

21.3 Any employee wishing to perform paid or unpaid work for a rival party publication, radio or television outlet must receive written approval from the editor before doing so.

21.4 Contributors must comply with provisions relating to conflicts and must declare any real or potential conflict of interest arising from material submitted for publication and supervisors must do their utmost to ensure no conflict exists. Any association which may have a bearing, or appear to have a bearing, on a contributor's view, must be identified with the published material.

21.5 Failure to notify the editor and managing editor of any real or potential conflict of interest may result in dismissal.

22. Standards of Business Conduct

22.1 News Corporation has in place Standards of Business Conduct with which employees must comply. These are available on the Intranet.

23. Confidential Information

23.1 The company's reputation is one of our most valuable assets. We are all responsible for protecting the confidentiality of company information and we cannot:

- Disclose that information to third parties without proper authorisation to do so;
- Use the information for personal gain; or
- Use the information in any manner that is inconsistent with the company's interests.
- Confidential information may include information or data about the company's planning, business strategy, projects, existing or potential customers, competitors or suppliers, financial results or operations, major contracts, commencement of major litigation, confidential personnel information and anything else which is not in the public domain.

24. Other Obligations

24.1 Do not bring the reputation of the company, your colleagues or your masthead into disrepute.

24.2 Respect the confidences and sensitivities of your colleagues at all times.

24.3 Familiarise yourself with the company policies regarding employees such as bullying and harassment.

25.3 All employees are required to be neat and dressed appropriately for their particular job.

25.5 Employees must protect company assets from theft, carelessness, waste and misuse and respect the property rights of others.

26. Breaches of policy

26.1 Group publications must regularly publish advice to readers on how to lodge a complaint about the conduct of an editorial employee or the content of a story.

26.2 Responses to complaints by an authorised officer of the company should be timely, subject to any legal considerations.

26.3 Complaints involving alleged breaches of this policy will be investigated by the managing editor of the newspaper concerned, or by an executive of equivalent status. Proven breaches will be dealt with in accordance with the company's disciplinary procedures.

News Limited

Editorial Code of Conduct Professional Conduct Policy July 2012

Exhibit M



Delivering *extraordinary* experiences for our customers and consumers is at the heart of who we are.

News Corp Australia



Together we're striving to unlock the power of the imagination.

We're obsessed by food. Like taste.com.au offering over 26,000 recipes providing ideas and inspiration to suit all levels of cooking ability from the first time cook to the fastidious foodie.

for customers.

FB NEWSWIRE

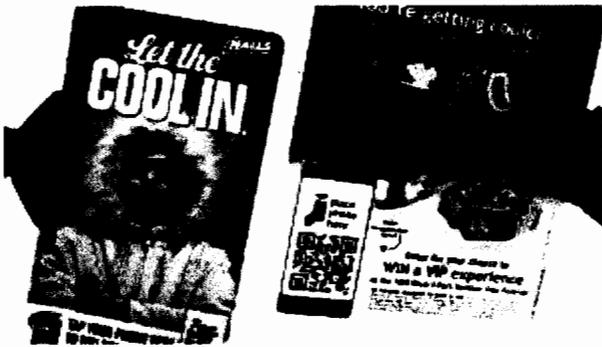
FB Newswire

powered by **storyful.**

Authenticating information is at the helm of our mission to produce and disseminate quality news across the globe.

A partnership between Storyful and Facebook has made finding verified news content, including videos and photos, seamless. FB Newswire aggregates real-time, user-generated news in a groundbreaking resource that journalists can turn to for accurate results.

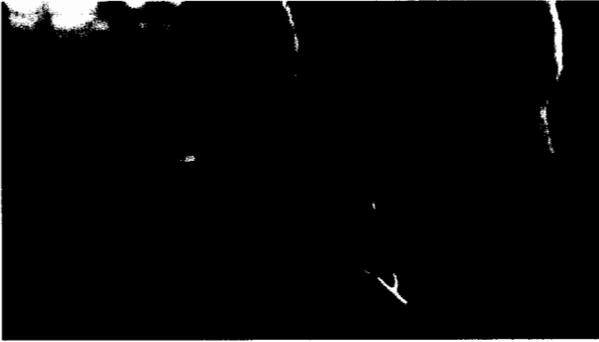
NEWS AMERICA MARKETING



Increasingly smarter phones means we're finding more intuitive and useful ways to connect our daily routine to the very devices we depend on daily.

News America Marketing has partnered with Thinaire and Bertolli Olive Oil to launch a point-of-purchase campaign allowing shoppers with NFC-enabled phones to instantly pull up recipes, videos and useful cooking tips while shopping the olive oil aisle of their local grocery store — all with just a tap of a phone.

AMPLIFY



We're building digital curriculum to reflect the information-rich and collaborative structure of the K-12 classroom.

Beginning Fall 2014, students in Grades 6-8 will get Language Arts classes with a twist — an e-library stocked with more than 300 books, richer digital media inside 20 curriculum-intense games, and a smarter analytics engine that promotes 3x more reading and writing. Together with Amplify's sturdier Intel-based tablets, the 2014-2015 school year is open for a better digital education.

NEWS CORP AUSTRALIA



We're making leaps in mobile advertising by expanding our customers' connectivity in an increasingly mobile market.

Advertisers in Australia can now take advantage of expanding timed and adhered mobile ads that don't interfere with user experience. This means that brands can optimize space and attractively engage readers in a friendly, non-intrusive way.

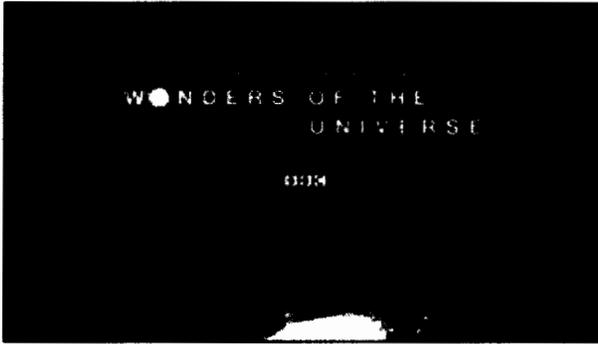
THE TIMES MAGAZINE



We know what it takes to captivate the attention of the contemporary consumer.

Advertisers rely on us to expand their audiences and to increase revenue, and this drives the innovation behind our advertising products. In the case of The Times Magazine, we introduced a 'tap and buy' feature resulting in a seamless experience for our readers and new commercial opportunities for our clients.

WONDERS OF THE UNIVERSE



The Wonders of the Universe app developed by HarperCollins UK set the bar for innovation in the book publishing industry.

Marrying gorgeous CGI visuals, BBC video content and an impressive user experience, The Wonders of the Universe app reached No. 1 on the UK's Top Grossing iPad App chart, exemplifying HarperCollins 200-year legacy of achieving maximum reach for authors.

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Exhibit N

From: **The Australian Community** <info@aucommunity.org>
Date: 2014-09-10 19:16 GMT+02:00
Subject: RE: September Newsletter Feedback

I do not believe they fly the newspapers to New York, however, many of our members subscribe electronically to these newspapers.

<http://www.theaustralian.com.au/>

<http://www.smh.com.au/>

<http://www.adelaidenow.com.au/>

We hope this helps,

Best Regards,

[646.249.1741](tel:646.249.1741) | info@AUCommunity.org | www.AUCommunity.org

Connecting 20,000 Australians in New York | | |