# IN THE COURT OF QUEEN'S BENCH OF ALBERTA JUDICIAL DISTRICT OF MEDICINE HAT

### **BETWEEN:**

### JOSEPH V. ANGLIN and CONSTANCE ELLEN JENSEN

**Plaintiffs** 

- and

### GEORGE READ and SUSAN STRATTON and DAVID CROWE

Defendants

## **Affidavit of Constance Ellen Jensen**

I, CONSTANCE ELLEN JENSEN, OF THE HAMLET OF BUCK LAKE, IN THE PROVINCE OF ALBERTA, HEREBY MAKE OATH AND SAY AS FOLLOWS:

1. This Affidavit is made in support of a Statement of Claim filed against the Defendants George Read, Susan Stratton, and David Crowe.

- 2. On or about the 5<sup>th</sup> of November 2008 a Notice of Motion was filed in the Court of Queen's Bench, in the judicial district if Red Deer seeking an Interlocutory Injunction whereby the Defendants in this Cause of Action, George Read and Susan Stratton are enjoined from;
  - a) Calling, proceeding with, or participating in any meeting of the Alberta Greens, a registered political party in the Province of Alberta, while purporting to hold the office or position of Party Leader or Party President, of the Alberta Greens;
  - b) Participating in the expenditure or disbursement of monies and funds, the property of the Alberta Greens, the borrowing of funds by the Alberta Greens, or the acknowledging of indebtedness by the Alberta Greens for debts or contractual matters arising on and after the 27<sup>th</sup> day of September, 2008;
  - c) Exercising control over the Alberta Greens membership list; and,
  - d) Exercising control over the Alberta Greens membership list.
- 3. On or about 07:56 a.m. on the 12<sup>th</sup> of November 2008 the former Alberta Greens Chief Financial Officer (CFO), Mr. David Crowe, telephoned me, on Edwin Erickson's cell phone and said he was in receipt of some documents wherein it evidenced that Mr. Joe Anglin had lied under oath in the EUB/Lavesta hearings and asked me, "Is this the kind of person that the Alberta Greens would want as the leader. A copy of the telephone invoice evidencing the phone call is attached to this my affidavit as Exhibit "A".
- 4. Mr. Crowe further claimed to be in possession of information that Mr. Joe Anglin had been dismissed from the New York Police Department for mistreating or abusing a prisoner, and in his defence, Mr. Anglin had claimed he was framed.
- 5. Mr. Crowe stated he intended to submit these documents to the Calgary Herald, because they had the ability to verify these documents, if I did not withdraw my court action against Mr. Read and Ms Stratton by 9:00 am on Thursday, November 13, 2008.

- 6. I asked Mr. Crowe if he had spoken to Joe [Anglin] and he said, No, he had chosen to speak to me. Mr. Crowe then went on to say, "I am not going to discuss this with you. You know how to reach me." Mr. Crowe then hung up the phone.
- 7. On or about 11:03 p.m. on the 12<sup>th</sup> of November 2008 I called Mr. Crowe from my home and asked for clarification of his phone call referred to in paragraph #3, above. Mr. Crowe refused to elaborate and indicated he would keep the documents on his shelf. A copy of the telephone invoice evidencing the phone call is attached to this my affidavit as Exhibit "A".
- 8. I verily believe, Mr. David Crowe, whom I believe to have exclusive control of the Alberta Greens financial records and is known to me to have taken directions from Mr. Read and Ms. Stratton, acted to obstruct my motion, referred to in paragraph #2, above by attempting to extort my obedience under the threat he would release defamatory documents that he believed would harm Mr. Joe Anglin's character and reputation, if Mr. Anglin and I did not withdraw our motion.
- 9. I verily believe my conversation with Mr. Crowe, referenced in paragraph # 3 above is an affirmation and indication of a course of action Mr. Crowe was both prepared and willing to engage in that I verily believe was a scheme designed to defame and malign the reputations of Mr. Joe Anglin and me.
- 10. On or about 7:00 PM on November 13, 2008 I attended a telephone conference call meeting purported to be a meeting of the Alberta Greens. Attending the conference call were Susan Stratton, Madeleine Oldershaw, David Crowe, Kim Warnke, Peter Johnson, George Read, Connie Jensen, Tom Lampman and Michael Black. At this meeting I formally raised my concerns to Susan Stratton, the conference call chairperson, of the utterance of threats and an attempt of extortion directed at me by a member attending the conference call meeting. I inferred that David Crowe had full knowledge of what I was talking about. A transcript of the conference call is attached as Exhibit "B" to this my affidavit.
- 11. On or about December 6, 2008 an agreement was signed with the parties George Read, Susan Stratton and David Crowe, attached as Exhibit # "C" to this my affidavit.

12. I verily believe, consistent with this affidavit; the affidavit of Mr. Joseph V. Anglin; the affidavit of Mr. Edwin Erickson; and this Statement of Claim to this honourable court that George Read, Susan Stratton and David Crowe failed to comply with the terms of the agreement, referenced in paragraph #11 above.

13. I verily believe, consistent with this affidavit and the affidavit of Mr. Joseph V. Anglin that George Read, Susan Stratton and David Crowe have ignored our requests and demands that they comply with the agreement or have, in effect, refused to comply with the agreement and have proceeded on a course of action to defame and malign Mr. Anglin and myself.

14. I make this my Affidavit in support of the Plaintiffs' Motion before this Honourable Court believing that if the interim relief sought is not granted, both myself and Mr. Anglin as the Plaintiffs in this action will suffer the irreparable harm of the deprivation of the offices to which we were duly elected, the opportunity to contribute to the governance of the party and the loss of our personal credibility.

I make this Affidavit in good faith and for no improper purpose.

SWORN before me at the City of Red Deer, in the Province of Alberta,	)	
this 6 <sup>th</sup> day of April, 2010	)	CONSTANCE ELLEN JENSEN
A Commissioner For Oaths in and for		
The Province of Alberta		

## IN THE COURT OF QUEEN'S BENCH OF ALBERTA JUDICIAL DISTRICT OF MEDICINE HAT

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**Plaintiffs** 

- and

### GEORGE READ and SUSAN STRATTON and DAVID CROWE

Defendants

## **Affidavit of EDWIN ERICKSON**

I, EDWIN ERICKSON, OF THE COUNTY OF WETASKIWIN, IN THE PROVINCE OF ALBERTA, HEREBY MAKE OATH AND SAY AS FOLLOWS:

- 1. On the 12<sup>th</sup> of November 2008 Ms. Connie Jensen accompanied me to the Ft. Whoop-Up Historical Site in Lethbridge, Alberta, where I was engaged in fulfilling a contract for restoration work at that site.
- 2. On or about 07:56 a.m. on the 12<sup>th</sup> of November 2008, Ms. Connie Jensen was standing next to me within the grounds of Ft. Whoop-Up Historical Site in Lethbridge, Alberta. At or about

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this time I received a telephone call from the former Alberta Greens Chief Financial Officer (CFO), Mr. David Crowe on my cell phone and he asked to speak with Connie, referring to Ms. Connie Jensen. A record of this telephone call invoice is attached as Exhibit A to this my affidavit.

- 3. During the phone conversation between Mr. Crowe and Ms. Jensen, referenced in paragraph #2 above, I observed that a state of abrupt seriousness overtook Ms. Jensen's demeanour, and her composure and the look upon her face indicated to me something was not right. The otherwise pleasant mood of the morning conversation was suddenly interrupted with short periods of silence and words that indicated to me that something serious was being discussed. I heard from Ms. Jensen's part of the conversation that she was being confronted in an offensive manner. As I watched and listened, Ms. Jensen appeared disturbed by the call, and was obviously shaken by the content and nature of the call.
- 4. When Ms. Jensen finished speaking to Mr. Crowe, referenced in paragraph # 2 above, she hung up the phone and returned my cell phone to me. Ms. Jensen then told me that David Crowe had threatened to release derogatory information concerning Joe Anglin to the press if Ms. Jensen and Mr. Anglin did not immediately withdraw their legal proceedings against Mr. Crowe and his associates in the Alberta Greens. I understood, based on what Ms. Jensen told me, that Mr. Crowe attempted to extort her obedience under the threat that he would release defamatory documents that he believed would harm Mr. Joe Anglin's character and reputation.
- 5. I verily believe, consistent with the affidavit of Ms. Jensen, and this Statement of Claim that Mr. David Crowe did threaten Ms. Jensen during the course of the telephone conversation, and attempted to force her to withdraw the legal action filed by Ms. Jensen and Mr. Anglin.
- 6. Upon completion of the call, I witnessed that Ms. Jensen immediately called Mr. Joe Anglin and later that morning talked with her lawyer, Mr. Luke Kurata. Ms. Jensen then called and filed a complaint to the Calgary City Police Dept concerning the phone conversation.
- 7. I was later informed by Ms. Jensen that, on or about 11:03 PM November 12, 2008, Ms. Jensen telephoned Mr. Crowe from my residence telephone, in an attempt to obtain

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clarification from Mr. Crowe regarding the nature of his purported claims against Mr. Anglin. I was told by Ms. Jensen that Mr. Crowe had been uncooperative and refused to discuss the matter further.

- 8. I make this my Affidavit in support of the Plaintiffs' Statement of Claim before this Honourable Court believing that Ms. Jensen's telephone conversation with Mr. Crowe, referenced in paragraph #5 above, is an affirmation and indication of a course of action Mr. Crowe was prepared and willing to engage in, and that I verily believe the aforementioned phone call was a scheme designed to obstruct justice and to potentially defame and malign the integrity and character of Mr. Joe Anglin.
- 9. I verily believe, consistent with the affidavit of Ms. Connie Jensen that Mr. David Crowe acted to extort her obedience under the threat that he would release defamatory documents which he believed would harm Mr. Joe Anglin's character and reputation, if Mr. Anglin and Ms. Jensen did not withdraw their motion.

I make this Affidavit in good faith and for no improper purpose.

SWORN before me at the City of Red Deer, in the Province of Alberta,	)		
this 6 <sup>th</sup> day of April 2010	,	EDWIN ERICKSON	
A Commissioner For Oaths in and for The Province of Alberta			

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