

Aug 27/14

AMara

- opinion directed to
- problem: lawyer told media not being funded.]

he was misquoted →

"paying own legal bills
now but will be
treated just like anyone
else as to whether
she qualifies for
immigration"

[possible to
correct misquote?]

did not say it] would not
be identified - not a
quote.

- not exactly i-correct
- craker wants story
- he said it to Shana while next
to Ben Chin → seems like she
might be
identified

Part of time w/ WhatsApp

- don't say anything that could be interpreted.
- totally transparent

↙
[What do you want to do?]

s.22

s.22

Kent, Jennifer JAG:EX

From: Mentzelopoulos, Athana JTST:EX
Sent: Thursday, September 4, 2014 1:13 PM
To: Butler, Richard JAG:EX
Subject: Fw: Athana Mentzelopoulos -- application for coverage

Hi there -- closing the loop. Mr. Wotherspoon has advised Rob Shaw.
Thanks!

Sent from my BlackBerry 10 smartphone on the TELUS network.

s.14, s.22

From: Butler, Richard JAG:EX
Sent: Wednesday, September 3, 2014 9:15 AM
To: Mentzelopoulos, Athana JTST:EX
Cc: Sandstrom, Kurt JAG:EX; Chalke, Jay JAG:EX
Subject: RE: Athana Mentzelopoulos -- application for coverage

May I suggest the additional words, in red?

The purpose is to direct Mr. Shaw to the regulation, and the process and criteria thereunder, and allow your lawyer, in anticipation of any follow-up questions, simply to refer him there.

Richard

From: Mentzelopoulos, Athana JTST:EX
Sent: Wednesday, September 3, 2014 8:22 AM
To: Butler, Richard JAG:EX
Subject: FW: Athana Mentzelopoulos -- application for coverage

Good morning. Further to our conversation,

s.22

s.22

From: Butler, Richard JAG:EX
Sent: Friday, August 29, 2014 3:19 PM
To: Mentzelopoulos, Athana JTST:EX
Subject: FW: Athana Mentolopoulos -- application for coverage

Athana:

The coverage approval letter will be prepared and will likely be sent out next week.

Could you please send us the proposed wording of your or your lawyer's statement, for approval.

Thanks,

Richard

s.14

Page 5 redacted for the following reason:

s.14

Kent, Jennifer JAG:EX

From: Mentzelopoulos, Athana JTST:EX
Sent: Thursday, September 4, 2014 12:02 PM
To: Butler, Richard JAG:EX
Cc: Sandstrom, Kurt JAG:EX; Chalke, Jay JAG:EX
Subject: RE: Athana Mentzelopoulos -- application for coverage

Agreed. I will confirm later today that this has been completed.

From: Butler, Richard JAG:EX
Sent: Wednesday, September 3, 2014 9:15 AM
To: Mentzelopoulos, Athana JTST:EX
Cc: Sandstrom, Kurt JAG:EX; Chalke, Jay JAG:EX
Subject: RE: Athana Mentzelopoulos -- application for coverage
May I suggest the additional words, in red?

The purpose is to direct Mr. Shaw to the regulation, and the process and criteria thereunder, and allow your lawyer, in anticipation of any follow-up questions, simply to refer him there.

Richard

From: Mentzelopoulos, Athana JTST:EX
Sent: Wednesday, September 3, 2014 8:22 AM
To: Butler, Richard JAG:EX
Subject: FW: Athana Mentzelopoulos -- application for coverage
Good morning. Further to our conversation,

s.22

s.22

From: Butler, Richard JAG:EX
Sent: Friday, August 29, 2014 3:19 PM
To: Mentzelopoulos, Athana JTST:EX
Subject: FW: Athana Mentolopoulos -- application for coverage
Athana:

The coverage approval letter will be prepared and will likely be sent out next week.
Could you please send us the proposed wording of your or your lawyer's statement, for approval.
Thanks,
Richard

s.14

Page 7 redacted for the following reason:

s.14

Kent, Jennifer JAG:EX

Sent: Wednesday, September 3, 2014 9:32 AM
To: Mentzelopoulos, Athana JTST:EX
Cc: Sandstrom, Kurt JAG:EX; Chalke, Jay JAG:EX
Subject: FW: Athana Mentzelopoulos -- application for coverage

s.22

From: Butler, Richard JAG:EX
Sent: Wednesday, September 3, 2014 9:15 AM
To: Mentzelopoulos, Athana JTST:EX
Cc: Sandstrom, Kurt JAG:EX; Chalke, Jay JAG:EX
Subject: RE: Athana Mentzelopoulos -- application for coverage
May I suggest the additional words, in red?

The purpose is to direct Mr. Shaw to the regulation, and the process and criteria thereunder, and allow your lawyer, in anticipation of any follow-up questions, simply to refer him there.

Richard

From: Mentzelopoulos, Athana JTST:EX
Sent: Wednesday, September 3, 2014 8:22 AM
To: Butler, Richard JAG:EX
Subject: FW: Athana Mentzelopoulos -- application for coverage
Good morning. Further to our conversation,

s.22

s.22

From: Butler, Richard JAG:EX
Sent: Friday, August 29, 2014 3:19 PM
To: Mentzelopoulos, Athana JTST:EX
Subject: FW: Athana Mentolopoulos -- application for coverage
Athana:

The coverage approval letter will be prepared and will likely be sent out next week.

Could you please send us the proposed wording of your or your lawyer's statement, for approval.

Thanks,

Richard

s.14

Page 9 redacted for the following reason:

s.14

Kent, Jennifer JAG:EX

From: Mentzelopoulos, Athana JTST:EX
Sent: Friday, August 29, 2014 3:35 PM
To: Butler, Richard JAG:EX
Subject: Re: Athana Mentolopoulos -- application for coverage

Thank you. I will provide all necessary materials by eob Tuesday if that is okay. I appreciate your attention to this -- thank you! Have a nice weekend.

Athana

Sent from my iPad

On Aug 29, 2014, at 15:19, "Butler, Richard JAG:EX" <Richard.Butler@gov.bc.ca> wrote:

Athana:

The coverage approval letter will be prepared and will likely be sent out next week.

Could you please send us the proposed wording of your or your lawyer's statement, for approval.

Thanks,

Richard

s.14

Kent, Jennifer JAG:EX

From: Mentzelopoulos, Athana JTST:EX
Sent: Wednesday, August 27, 2014 12:04 PM
To: Butler, Richard JAG:EX
Subject: Re: Your application for coverage

I will call u at 4. Thanks!

Sent from my BlackBerry 10 smartphone on the TELUS network.

From: Butler, Richard JAG:EX
Sent: Wednesday, August 27, 2014 16:03
To: Mentzelopoulos, Athana JTST:EX
Subject: RE: Your application for coverage

Sure. Or maybe it can wait til you get back. Up to you.

250-356-6559

From: Mentzelopoulos, Athana JTST:EX
Sent: Wednesday, August 27, 2014 11:38 AM
To: Butler, Richard JAG:EX
Subject: Re: Your application for coverage

Could we talk at 4 pm PST? I am in Charlottetown and I have a brief break at that time. Athana

Sent from my BlackBerry 10 smartphone on the TELUS network.

From: Butler, Richard JAG:EX
Sent: Wednesday, August 27, 2014 15:11
To: Mentzelopoulos, Athana JTST:EX
Subject: Your application for coverage

Hi Athana

Would you please let me know a convenient time for a short conversation by telephone?

Thanks,

Richard

Not Responsive

From: Heuman, Sheena A JAG:EX
Sent: Monday, August 25, 2014 2:33 PM
To: Philippides, Edna M JAG:EX
Cc: Sandstrom, Kurt JAG:EX; Lyttle, Shawna JAG:EX; Butler, Richard JAG:EX; Moore, Marsha C JAG:EX; Richter, Connie JAG:EX; Mead, Rhonda JAG:EX
Subject: RE: s.14

Kurt is s.22 and I haven't been able to confirm his attendance. I think we can work our Branch Management agenda so that Kurt attends the 2:30 meeting with Jay. Will you send a meeting invite?

Sheena Heuman
 Executive Coordinator
 Office of the Assistant Deputy Attorney General
 PO Box 9280, Stn Prov Gov't
 Victoria BC V8W 9J7
 Phone: (250) 356-8467
 Fax: (250) 356-5111
 Email: Sheena.Heuman@gov.bc.ca

From: Philippides, Edna M JAG:EX
Sent: Monday, August 25, 2014 2:26 PM
To: Heuman, Sheena A JAG:EX
Subject: RE: s.14

Hi Sheena, any news?

Thanks.

From: Heuman, Sheena A JAG:EX
Sent: Monday, August 25, 2014 11:14 AM
To: Philippides, Edna M JAG:EX; Moore, Marsha C JAG:EX; Mead, Rhonda JAG:EX
Cc: Richter, Connie JAG:EX
Subject: RE: s.14

I am checking if Kurt needs to attend as well as Richard Butler....our Branch Management Team meeting is 1:00 to 4:30 tomorrow. I'll let you know shortly

Sheena Heuman
 Executive Coordinator
 Office of the Assistant Deputy Attorney General
 PO Box 9280, Stn Prov Gov't
 Victoria BC V8W 9J7
 Phone: (250) 356-8467
 Fax: (250) 356-5111
 Email: Sheena.Heuman@gov.bc.ca

From: Philippides, Edna M JAG:EX
Sent: Monday, August 25, 2014 11:07 AM
To: Heuman, Sheena A JAG:EX; Moore, Marsha C JAG:EX; Mead, Rhonda JAG:EX
Cc: Richter, Connie JAG:EX
Subject: RE: s.14
Importance: High

Sorry, everyone, there's a typo below – should be 2:30 – 3:00 (not 3:30) – just a half-hour.

Thanks.

From: Philippides, Edna M JAG:EX
Sent: Monday, August 25, 2014 10:49 AM
To: Sandstrom, Kurt JAG:EX; Butler, Richard JAG:EX; DeWitt-Van Oosten, Joyce M JAG:EX

Cc: Heuman, Sheena A JAG:EX: HOLD 2014 July 28 Earl. Jennifer JAG:EX; Richter, Connie JAG:EX
Subject: FW: s.14

Good morning,

Jay has asked me to arrange a meeting with you re the below. Would you be available on Tuesday, 26 August, 2:30 – 3:30? He will be in the Deputy's office just prior, for signing, etc., so the meeting could take place there.

Thanks.

Begin forwarded message:

s.22

s.14

Pages 14 through 16 redacted for the following reasons:

s.14

Ok, thanks.

Sheena Heuman

Executive Coordinator

Office of the Assistant Deputy Attorney General

PO Box 9280, Stn Prov Gov't

Victoria BC V8W 9J7

Phone: (250) 356-8467

Fax: (250) 356-5111

Email: Sheena.Heuman@gov.bc.ca

From: Butler, Richard JAG:EX

Sent: Monday, August 25, 2014 12:26 PM

To: Heuman, Sheena A JAG:EX

Subject: RE: s.14

Kurt seems to want to, which is why it's on Tuesday.

From: Heuman, Sheena A JAG:EX

Sent: Monday, August 25, 2014 11:18 AM

To: Butler, Richard JAG:EX

Subject: FW: s.14

Do you and Kurt both need to attend the meeting with Jay?

Sheena Heuman

Executive Coordinator

Office of the Assistant Deputy Attorney General

PO Box 9280, Stn Prov Gov't

Victoria BC V8W 9J7

Phone: (250) 356-8467

Fax: (250) 356-5111

Email: Sheena.Heuman@gov.bc.ca

From: Philippides, Edna M JAG:EX

Sent: Monday, August 25, 2014 11:17 AM

To: Heuman, Sheena A JAG:EX

Subject: RE: s.14

Thanks Sheena.

From: Heuman, Sheena A JAG:EX

Sent: Monday, August 25, 2014 11:14 AM

To: Philippides, Edna M JAG:EX; Moore, Marsha C JAG:EX; Mead, Rhonda JAG:EX

Cc: Richter, Connie JAG:EX

Subject: RE: s.14

I am checking if Kurt needs to attend as well as Richard Butler....our Branch Management Team meeting is 1:00 to 4:30 tomorrow. I'll let you know shortly

Sheena Heuman

Executive Coordinator

Office of the Assistant Deputy Attorney General

PO Box 9280, Stn Prov Gov't

Victoria BC V8W 9J7

Phone: (250) 356-8467

Fax: (250) 356-5111

Email: Sheena.Heuman@gov.bc.ca

From: Philippides, Edna M JAG:EX

Sent: Monday, August 25, 2014 11:07 AM

To: Heuman, Sheena A JAG:EX; Moore, Marsha C JAG:EX; Mead, Rhonda JAG:EX

Cc: Richter, Connie JAG:EX

Subject: RE: s.14

Importance: High

Sorry, everyone, there's a typo below – should be 2:30 – 3:00 (not 3:30) – just a half-hour.

Thanks.

From: Philippides, Edna M JAG:EX

Sent: Monday, August 25, 2014 10:49 AM

To: Sandstrom, Kurt JAG:EX; Butler, Richard JAG:EX; DeWitt-Van Oosten, Joyce M JAG:EX

Cc: Heuman, Sheena A JAG:EX; HOLD 2014 July 28 Earl, Jennifer JAG:EX; Richter, Connie JAG:EX

Subject: FW: s.14

Good morning,

Jay has asked me to arrange a meeting with you re the below. Would you be available on Tuesday, 26 August, 2:30 – 3:30? He will be in the Deputy's office just prior, for signing, etc., so the meeting could take place there.

Thanks.

Begin forwarded message:

s.22

Pages 19 through 21 redacted for the following reasons:

s.14

Thanks Richard.

s.22

From: Butler, Richard JAG:EX

Sent: Monday, August 25, 2014 12:26 PM

To: Philippides, Edna M JAG:EX

Subject: RE:

s.14

No Cori is now my assistant

s.22

Marsha is helping me today

From: Philippides, Edna M JAG:EX

Sent: Monday, August 25, 2014 11:00 AM

To: Butler, Richard JAG:EX

Subject: RE:

s.14

Thanks Richard.

Sorry, I understood Marsha was

s.22

and wasn't sure who else might be assisting you. I will work with

Chris on this ...

From: Butler, Richard JAG:EX

Sent: Monday, August 25, 2014 10:53 AM

To: Philippides, Edna M JAG:EX; Sandstrom, Kurt JAG:EX; DeWitt-Van Oosten, Joyce M JAG:EX

Cc: Heuman, Sheena A JAG:EX; HOLD 2014 July 28 Earl, Jennifer JAG:EX; Richter, Connie JAG:EX; Moore, Marsha C JAG:EX

Subject: RE:

s.14

I am available at that time. Please advise Marsha for purposes of my calendar.

From: Philippides, Edna M JAG:EX

Sent: Monday, August 25, 2014 10:49 AM

To: Sandstrom, Kurt JAG:EX; Butler, Richard JAG:EX; DeWitt-Van Oosten, Joyce M JAG:EX

Cc: Heuman, Sheena A JAG:EX; HOLD 2014 July 28 Earl, Jennifer JAG:EX; Richter, Connie JAG:EX

Subject: FW:

s.14

Good morning,

Jay has asked me to arrange a meeting with you re the below. Would you be available on Tuesday, 26 August, 2:30 – 3:30? He will be in the Deputy's office just prior, for signing, etc., so the meeting could take place there.

Thanks.

Begin forwarded message:

s.22

s.14

Pages 23 through 47 redacted for the following reasons:

s.14

Kent, Jennifer JAG:EX

From: Mentzelopoulos, Athana JTST:EX
Sent: Tuesday, August 19, 2014 9:26 AM
To: Butler, Richard JAG:EX
Subject: Fw: Copy of the Claim
Attachments: 20140815152958890.pdf

This may be helpful too. As for time to talk, just get in touch with me directly and we will work it out
Thanks!

Sent from my BlackBerry 10 smartphone on the TELUS network.

s.14, s.22

Pages 49 through 55 redacted for the following reasons:

s.3

Kent, Jennifer JAG:EX

From: Mentzelopoulos, Athana JTST:EX
Sent: Tuesday, August 19, 2014 9:08 AM
To: Butler, Richard JAG:EX
Subject: following up
Attachments: 20140818143300.pdf; libelbackground.docx

Hi there – attached is a the PDF of the form. Somehow I didn't scan page two. I have attached a word document with the background, but I also want to confirm that:

s.22

s.14, s.22

I would also like to confirm that I have filed a statement of claim – that was done on August 15.

Thank you for your consideration.

Athana

Excluded Employees Application for Indemnity Coverage



Where ideas work

PART 1 - ADMINISTRATIVE INFORMATION

Applicant Surname MENTZELOPOULOS	Applicant Given Name(s) ATHANA	Employee Identification Number
Current Position Title, Ministry/Organization DEPUTY MINISTER JTS T	Applicant Phone Number s.17	Applicant Email Address athana.mentzelopoulos@ gov.bc.ca
Name of Your Direct Supervisor/Manager JOHN DYBLE	Supervisor/Manager Phone Number 250.356.2209	Supervisor/Manager Email Address john.dyble@gov.bc.ca
Name of Your Deputy Minister (or equivalent)	Deputy Minister Phone Number	Deputy Minister Email Address
Does the legal proceeding you are seeking indemnity coverage for involve your current position? ☐ Yes ☒ No		If you answered "no", state the ministry/organization, position title and time period that the legal proceeding involves. DM, GCPE ; JULY 2014

PART 2 - DETAILS OF LEGAL PROCEEDING (to be completed by the Applicant)

For what type of legal proceeding are you seeking indemnity coverage? (check one and also the final box if applicable)	
☐	Civil action against the Applicant
☐	Defamation action against the Applicant
☒	Defamation action commenced or continued by the Applicant
☐	Professional body proceeding in which the Applicant is the respondent
☐	Human rights proceeding in which the Applicant is a respondent
☐	Prosecution in which the Applicant is an accused person
☐	Penalty proceeding in which the Applicant is an accused person or the respondent
☐	Appeal or judicial review of the exercise of a statutory power by a person other than the Applicant
☐	An appeal from a proceeding related to any of the above
☐	Legal proceeding in which the Applicant is subpoena'd or otherwise wishes to appear as a witness
☐	No legal proceeding has been commenced, but there are reasonable grounds to believe a proceeding will likely be commenced

Excluded Employees Application for Indemnity Coverage



Where ideas work

PART 3 – APPLICANT DECLARATION (to be signed by the Applicant)

Notice of Collection

The information requested on this form is being collected for the purpose of processing your application for indemnity coverage under the Excluded Employees Indemnity Protection Regulation and Excluded Employees (Legal Proceedings) Indemnity Regulation. This information is collected in accordance with section 26 of the *Freedom of Information and Protection of Privacy Act*. Questions about the collection of this information can be directed to the Director, Policy and Research Branch, BC Public Service Agency, PO BOX 9404, Victoria, BC, V8W 9V1, (250) 952-6000.

Taxation

I acknowledge that if there is a finding in the proceeding that the conduct in relation to which I have received indemnity coverage did not occur in the performance of my office or was dishonest, malicious or otherwise in bad faith, the amount of the coverage may be treated as a benefit for income tax purposes.

Declaration of Applicant

I, the undersigned, wish to be considered for indemnity coverage regarding the legal proceeding described herein. I certify, to the best of my knowledge, that the information I have provided is complete, honest and accurate. I understand that misrepresentations by me may result in refusal, suspension or cancellation of coverage. I understand that all information provided in this application is subject to audit and verification and is subject to disclosure if required by law, including under the *Freedom of Information and Protection of Privacy Act*.

For the purpose of verifying information contained in this form, and for the purpose of further investigating my request for indemnification, I consent to the disclosure and indirect collection of my personal information relevant to this indemnity application by or to the BC Public Service Agency and other provincial ministries, departments and agencies. My consent is effective from the date of this form and does not expire unless it is revoked in writing to the BC Public Service Agency.

I also hereby consent under section 33.1(1)(b) of the *Freedom of Information and Protection of Privacy Act* to disclosure by government of the total amount paid or incurred by the government for coverage relating to the proceeding, and waive solicitor-client privilege respecting the total amount paid or reimbursed.

A handwritten signature in cursive script, appearing to read "Amenberger".

Applicant's Signature

A handwritten date "Aug 14, 2014" in cursive script.

Date Signed

Excluded Employees

Application for Indemnity Coverage



Where ideas work

PART 4 – CONFIRMATION BY DEPUTY MINISTER (to be completed by the Applicant's deputy minister)

As the Applicant's deputy minister, can you confirm that you have made appropriate inquiries within your ministry and on that basis have satisfied yourself on each of the following points:

- (a) the Applicant's involvement as a party to the proceeding arises from conduct that occurred in the performance of his or her office,
- (b) if the Applicant's involvement is as a witness in the proceeding, the evidence or testimony the Applicant is to provide relates to information acquired in the course of his or her office, and
- (c) there is no reason to believe the Applicant's conduct in connection with this legal proceeding was dishonest, malicious or in bad faith? (Applies only in non-criminal proceedings)

☐ Yes ☐ No

Please provide any additional explanation or qualification with whatever particulars you feel are relevant (a separate explanatory document may be attached if necessary)

If this is a legal proceeding where the Applicant wishes to sue in defamation, please identify the factors you believe make such an action in the public interest (check all that apply) and provide particulars as indicated (a separate explanatory document may be attached if necessary)

☐ The need to rehabilitate the Applicant's usefulness for employment or appointment, including future employment or appointment by an employer
(What is the connection between reputation and the Applicant's ability to perform his/her employment or office? Why is reputation key to the performance of that employment or office, or to the Applicant's future employment/appointment? What specific and practical impacts have the attacks on his/her reputation had in that regard? Please provide evidence. Why is it in the public interest (as distinct from the Applicant's own interest) to rehabilitate that particular person's usefulness?)

☐ The need to restore or preserve the integrity of the Applicant's office or position of employment or appointment
(What is it about the office or position of employment that requires protection? How has the defamatory attack on the Applicant undermined the integrity of the office or position (as distinct from the Applicant him or herself)? What specific and practical ongoing impact will there be on the office or position if the attack is not answered?)

☐ The degree of likelihood that the defamation action will achieve the objectives set out in the two bullets above
(Assuming the defamation action will be successful at law, and an injunction can be obtained with respect to current and future defamatory publications, how and to what degree will that result alleviate the reputational harm which has impacted the Applicant's usefulness to government?)

Excluded Employees Application for Indemnity Coverage



Where ideas work

☐ The need to achieve general deterrence of defamatory statements against Applicants

(General deterrence of attacks of this nature, as distinct from specific deterrence of this attacker or attacks against this Applicant)

☐ Other factors that may be relevant to the public interest in commencing or continuing the defamation action by the Applicant. Please briefly describe any such factors:

(Cost benefit analysis. Will an action in defamation merely create a platform and legal mechanisms for the defamer to pursue a personal vendetta or his/her broader complaints against government? Is there another way to address, in whole or part, the impacts of the attacks, other than by effectively putting the Applicant's reputation on trial?)

If this is a legal proceeding where the Applicant is seeking coverage as party to an appeal, please identify the factors you believe make such coverage in the public interest (check all that apply) and provide particulars as indicated (a separate explanatory document may be attached if necessary)

☐ There are reasonable grounds to believe that the Applicant's reputation or personal privacy interests, or the integrity of the Applicant's office or position of employment, is likely to be adversely affected if the appeal did not proceed.

☐ Other factors that may be relevant to the public interest. Please briefly describe any such factors.

If this is a legal proceeding where the Applicant is seeking coverage as a witness, and the Applicant has not been subpoena'd, please identify the factors you believe make such coverage in the public interest (check all that apply) and provide particulars as indicated (a separate explanatory document may be attached if necessary)

☐ There are reasonable grounds to believe that the Applicant's reputation is likely to be adversely affected by evidence given in the proceeding.

☐ There are reasonable grounds to believe that any conduct of the Applicant in the performance of employment is likely to be subject to negative findings in the proceeding.

Excluded Employees
Application for Indemnity
Coverage



Where ideas work

☐ There are reasonable grounds to believe that the Applicant's personal privacy interests are likely to be adversely affected.
☐ Other factors that may be relevant to the public interest. Please briefly describe any such factors.

PART 5 – DEPUTY MINISTER DECLARATION (to be completed by the Applicant's deputy minister)

I, the undersigned, recommend indemnity coverage for this Applicant regarding the legal proceeding described herein.

I agree to immediately notify the Head of the BC Public Service Agency and/or the Assistant Deputy Attorney General, Ministry of Justice and Attorney General, regarding any issues or emerging facts that may affect the applicant's eligibility for indemnity coverage.

Deputy Minister's Signature

Date Signed

To the Applicant – Once completed and signed, please submit this form to:

Lynda Tarras
Head of the BC Public Service Agency
BC Public Service Agency
PO BOX 9404
Victoria, BC V8W 9V1
Email: Lynda.Tarras@gov.bc.ca

Pages 62 through 63 redacted for the following reasons:

s.14, s.22

Kent, Jennifer JAG:EX

From: Mentzelopoulos, Athana JTST:EX
Sent: Wednesday, August 13, 2014 3:10 PM
To: Butler, Richard JAG:EX
Cc: Fyfe, Richard J JAG:EX
Subject: RE: Question

Thanks Richard. I am working through the application ... should have it to you soon. Athana

-----Original Message-----

From: Butler, Richard JAG:EX
Sent: Wednesday, August 13, 2014 3:09 PM
To: Mentzelopoulos, Athana JTST:EX
Cc: Fyfe, Richard J JAG:EX
Subject: FW: Question

Hi Athana:

Just following up on this. Please let me know if you have any questions or concerns.

Richard

-----Original Message-----

From: Butler, Richard JAG:EX
Sent: Friday, August 8, 2014 2:40 PM
To: Mentzelopoulos, Athana JTST:EX
Cc: Fyfe, Richard J JAG:EX
Subject: RE: Question

As discussed.

You fill in part 1, 2 and 3. The form is not user friendly. Fill in most of it with a pen. Type anything longer than a sentence on a separate piece of paper and attach. When ready, send it to Fyfe by email attachment, with a cover letter saying in 10 sentences or so how the elements of Part 4 relating to a defamation action are met in your case.

Richard

-----Original Message-----

From: Mentzelopoulos, Athana JTST:EX
Sent: Friday, August 8, 2014 2:13 PM
To: Butler, Richard JAG:EX
Subject: Question

Hi there -- Richard Fyfe suggested I talk to you about an indemnification issue. Would you be free a call sometime this afternoon? Thanks!

Sent from my iPad

Athana M.

→ subject of alleg in NCP

> spoke to lawyer → David Wolpert
Furber

> received 30K from
- pre-v's bridemaid

- email Rob Fleming ~~was~~ to
dist list

- Pending joining tactic. - if sig -
add to mailing
list

sent Fleming a letter

not a lie -- 30K more ... public acct's

> backstory —

s.22

upcoming Fyfe →
intent.

s.22

- already started

[will send you the
form]

Pages 66 through 84 redacted for the following reasons:

s.14