

WITNESSES

86. At this time, the respondent proposes calling the following witnesses:

Ian MacDonald - Ian MacDonald is the author of one of the impugned messages and will give evidence regarding it.

William Livingstone - Mr. Livingstone will testify to the fact of Mr. Lemire being targeted by Anti-Racist Action, a group before which Mr. Warman has been a prominent speaker. Mr. Lemire has been attacked physically, had private property vandalized and been threatened. **He will identify documents in the case. He will testify to the effect and his user experience of the Freedomsite.org.**

Jerry Neuman - Mr. Neuman will prove documents relating to the case and video evidence. **He will give testimony about violence against those accused of hatred from his personal experience. He will testify to the effect and his user experience of the Freedomsite.org.**

Paul Fromm - Mr. Fromm has represented various persons brought before Tribunals under section 13 or is personally knowledgeable about others whom he did not represent. **He will provide testimony concerning the respondents and their cases. He will identify documents he has received from persons who have laid complaints under section 13 which were refused by the Commission.**

Kevin Strom - Mr. Strom is the author of AIDS Secrets and will testify to the content of the article.

The respondent reserves the right to add further witnesses pending the provision of further particulars and disclosure from the Commission and Mr. Warman which the respondent has requested.

Mr. Lemire may also request the Tribunal to subpoena certain witnesses. This matter, however, will be raised in a motion to the Tribunal.

AMENDED STATEMENT OF PARTICULARS; DATED December 18, 2006