

Post Number #55

26th January 2015, 12:57 PM



Marc

Total Posts: 24,611



Re: Chris Paris - At it again - October - December 2014 and January 2015

Well, folks, Chris Paris of Oxbridge is at it again!

Document 1:

Quote:

In Reply to Parent Post by Oxbridge Lawsuit

Case 8:15-cv-00011-EAK-TBM

Document 6 Filed 01/09/15 Page 2 of 2 PageID 68\ (Page 2 is missing...)

AO 440 (Rev. 06112) Summons in iI Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

PlaintijJ(s) v.

)))))))))

Civil Action No.

OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC, and CHRISTOPHER PARIS, individually,

MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS SYSTEMS,

Defendant(s)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Cayman Business Systems

8466 LeSourdsville-West Chester Road Olde West Chester, Ohio 45069-1929

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) - or 60 days 'if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) - you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiffs attorney, whose name and address are:

Bill Wohlsifer, Esquire William R. Wohlsifer, P.A. 1100 E. Park Ave, Ste B Tallahassee, FL 32304

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.

You also must file your answer or motion with the court.

CLERK OF COURT



Date: ' ~}~I

Signature of Clerk or Deputy Clerk

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UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA - ~ Irf, ! _ - cr' /. 0 ..

TAMPA DIVISION -- J ' .. :., J : I • ,u

OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC, and CHRISTOPHER PARIS, individually,

Plaintiffs,

vs. c.. II \ \\. e '1'61\, CASE NO.:

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vs.

MARC TIMOTHY SMITH, individually,

and d/b/a CAYMAN BUSINESS SYSTEMS,

Defendants.

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COMPLAINT FOR UNFAIR COMPETITION UNDER 15 U.S.C. 1125; VIOLATION OF §§ 772.102(1)(a)(26), 772.104(1) AND 836.05, FLORIDA STATUTES (EXTORTION); DEFAMATION PER SE; DEFAMATION; LIBEL; INJURIOUS FALSEHOOD; AND INJUNCTIVE RELIEF

COMES NOW the Plaintiffs, OXEBRIDGE QUALITY RESOURCES

INTERNATIONAL, LLC ("OXEBRIDGE") and CHRISTOPHER PARIS ("PARIS")

cumulatively ("Plaintiffs") by and through their undersigned attorney, and file this Complaint

against Defendants, MARC TIMOTHY SMITH, individually ("SMITH") and d/b/a CAYMAN

BUSINESS SYSTEMS ("CAYMAN") cumulatively ("Defendants"), for Unfair Competition

under 15 U.S.C. 1125; Violation of §§ 772.102(1)(a)(26), 772.104(1) and 836.05, Florida Statutes

(Extortion); Defamation; Defamation Per Se; Libel; Injurious Falsehood; and Injunctive Relief;

and hereby states the following:

JURISDICTION AND VENUE

1. This is an action for damages in excess of Seventy-Five Thousand (\$75,000) Dollars, exclusive of interest, costs and attorney's fees.

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2. At all times material, OXEBRIDGE was and is a for-profit limited liability company, organized under the laws of the State of Florida, with its principal place of business located at 1503 South US Highway 301, Tampa, FL 33619.
3. OXEBRIDGE has a single LLCmember, to-wit: CHRISTOPHER PARIS, who is a citizen of the State of Florida, domiciled in Hillsborough County, Florida.
4. SMITH is a citizen of the State of Ohio and does business as CAYMAN BUSINESS SYSTEMS with its principal place of business being in the State of Ohio.
5. Defendants have conducted and directly competed for business in the State of Florida.
6. Defendants have been providing "onsite" and "tailored" programs for twenty five years to businesses within the State of Florida including but not limited; Pall Aeropower Corporation of New Port Richey, Pasco County, Florida and the Federal Warranty Service Corporation of Tampa, Florida, within this district.
7. SMITH, by operating, conducting, engaging in, or carrying on a business venture in the State of Florida, SMITH availed himself and CAYMAN to the personal jurisdiction in the State of Florida, pursuant to section 48.1 93(I)(a), Florida Statutes.
8. SMITH availed himself to the personal jurisdiction of the State of Florida when he solicited consulting services of CAYMAN within the State, pursuant to section 48.193(1)(f)(1), Florida Statutes.
9. SMITH, availed himself to personal jurisdiction in the State of Florida by engaging in substantial business activity within the state, pursuant to Section 48.193(2), Florida Statutes.
10. The lion share of Plaintiffs' clientele and consulting business is in the aerospace industry. Plaintiffs' principal place of business is in the State of Florida. The "heart" of the aerospace industry is in the State of Florida. Thus, the "brunt" of the hann to plaintiffs was and is felt in Florida. Panavision International, L.P. v. Toeppen, 141 F. 3d 1316 (9th Cir, 1998).
11. By committing the tortious acts described in this Complaint, in the State of Florida, SMITH, subjected himself to personal jurisdiction in the State of Florida, pusuant to section 48.193(1)(b), Florida Statutes.
12. SMITH owns, operates and maintains Elsmar.com, which offers a free alternative to

standards consulting services to potential paying clients, of which SMITH derives income.

13. Many Florida businesses and individuals have requested and received assistance for industry standards in place of nonnally paid consulting services from Elsmar.com for example;

- a. Precision Resource - Florida Division, Inc. (Fort Lauderdale, FL)
- b. Mike Laurie - Quality Manager, Injection molding of aerospace and medical components (Sarasota, FL)
- c. Sun-Glo Plating Company, Inc. (Pinellas Park, FL)
- d. Giselle - Quality Manager, Automotive and Manufacturing Industry
- e. Virtual Imaging, Inc. (Boca Raton, FL)
- f. Gooch & Housego (Orlando, FL)

14. Elsmar.com is not a passive website nor is it merely interactive, because it requires original input each and every time Elsmar.com and the requesting party engage in industry-specific consultation. Further, "premium file access" can be purchased where editable Master Data File Sets are transmitted to "premium members", some of which in the State of Florida.

15. SMITH and CAYMAN's clients within the State of Florida use Elsmar.com to access training manuals and materials essential to Defendants' services.

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16. SMITH's actual interactions establish a physical presence within the State of Florida. The commercial quality and interaction with businesses and individuals within the State of Florida of Elsmar.com establish a "plus" factor to establish sufficient minimum contacts.

Cf Roblor Mktg. Group, Inc. v. Gps Indus., Inc., 645 F. Supp. 2d 1130 (S.D. Fla. 2009)

17. This action seeks to collect an amount exceeding \$75,000 and there is complete diversity between the parties; jurisdiction is proper under 28 U .S.C. § 1332.

18. This Court has original jurisdiction over Plaintiffs' Federal Unfair Competition Claim, pursuant to 28 U.S.C. § 1121, and supplemental jurisdiction over Plaintiffs' state law claims, pursuant to 28 U.S.C. 1367.

FACTUAL BACKGROUND

a. The Parties Business Models

19. Both Plaintiffs and Defendants offer commercial consulting and training services in the

ISO 9001 standard method for quality control. Therefore, Plaintiffs and Defendants are direct commercial competitors.

20. OXEBRIDGE has successfully implemented ISO 9001 quality control standards, including a 40-day implementation program, for many businesses, for many years.

21. SMITH operates the website www.elsmar.com (.. Elsmar.com ..). a public, prominently featured Internet forum that focuses on issues that impact the ISO 9001 quality control standard industry.

22. Elsmar.com includes a "solutions" page that is an advertisement for CAYMAN's consulting services.

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23. OXEBRIDGE, through its website and other publications, reports on incidents within the ISO 9001 and quality management profession that can negatively impact. This occasionally includes negative reporting on organizations that may advertise on Elsmar.com.

b. Knowingly Publishing False Material with Reckless Disregard for the Truth

24. SMITH continuously updates postings linking to old defamatory posts that are damaging to the Plaintiffs to purposefully bring such older postings from cache to into current or real time.¹

25. SMITH, despite knowing or with reckless disregard for the truth or falsity of such content, has continued on a malicious campaign for over fifteen (15) years of tortious interference, unfair competition, libel and defamation targeted against the Plaintiffs.

26. SMITH has the authority and duty to monitor the content posted on Elsmar.com.

27. SMITH, despite knowing or with reckless disregard for the truth or falsity of such content, has posted and refused to moderate numerous false statements including but not limited to:

a. SMITH continues to refer to the OXEBRIDGE implementation method as "fraudulent" and "misleading;"

b. SMITH has mischaracterized OXEBRIDGE's business model and its financial stability;

c. SMITH has falsely claimed PARIS has threatened him;

d. SMITH has falsely claimed PARIS has harassed him;

e. SMITH has made false claims and personally published attacks against PARIS;

f. SMITH has falsely accused OXEBRIDGE of deceptive advertising;

g. Other posts too numerous to list; and

1 See 1111 29(c) and 32, infra.

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h. Other posts that may occur after the drafting of this Complaint.

28. SMITH has mischaracterized OXEBRIDGE's business as one that "heavily depends upon registrations for their existence." (A copy of this post is attached hereto as Exhibit "A.")

29. SMITH has falsely claimed PARIS has threatened him with vulgar and nasty phone calls. (A copy of this post is attached hereto as Exhibit "8.")

30. SMITH has mischaracterized PARIS as a "paranoid schizophrenic" and "needing psychiatric help." (A copy of this post is attached hereto as Exhibit "C.")

31. SMITH has continually misrepresented the OXEBRIDGE business model as "failing." (A copy of this post is attached hereto as Exhibit "D.")

32. SMITH has continually, derogatorily, mischaracterized the OXEBRIDGE implementation method as a "Wonder," sarcastically insinuating that it is too good to be true, thus fraudulent. (A copy of this post is attached hereto as Exhibit "E.")

33. SMITH, on the Internet, describes the OXEBRIDGE "method" of ISO 9001 implementation as "misleading" and "deceptive" because of its 40-day implementation period, while on multiple occasions SMITH has contrarily accepted the possibility of a 30-day implementation period when performed by parties other than OXEBRIDGE. (A composite of these posts are attached hereto as Exhibit "F.")

34. SMITH continues to describe and mark any post regarding OXEBRIDGE or PARIS as a "fraud" or a "scam." While to the contrary, SMITH has admitted that he has no knowledge of the OXEBRIDGE implementation system, stating he does not "follow Paris and his company's scope of standards which they work with, so I don't really know what they're into." (A copy of the post is attached hereto as Exhibit "G.")

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c. SMITH's Malicious Intent

35. SMITH has demonstrated his malicious intent toward Plaintiffs through multiple postings and emails including but not limited to:

- a. "I honestly wanted to **** him [Paris] off and I told him why;"
- b. "Essentially Chris Paris is a paranoid stalker;"
- c. "It's all relative, anyway. Those posts [defaming Paris] are cached in lots of search engines. They're not going anywhere;"
- d. "This thread [defaming Paris] has served its purpose;"
- e. "Chris Paris has a problem. You may not be able to see it but many others do;"
- f. Other published malicious statements.

36. SMITH continues to use his control of Elsmar.com to selectively moderate the forum and to defame and misrepresent OXBRIDGE for the purpose of steering potential clients away from OXBRIDGE and PARIS, then to CA YMAN or other competitors.

37. SMITH, a as moderator of Elsmar.com, often cuts off discussion threads in support of PARIS and OXEBRIDGE.

38. SMITH uses his knowledge of Go ogle's search engine optimization to ensure that even old false publications remain in the top search results when searching for "OXEBRIDGE" on Google.

39. SMITH, after PARIS created an account on Elsmar.com, locked his account and altered PARIS' profile infonnation.

40. By locking PARIS' account SMITH prevented PARIS from posting to rebut the false publications on Elsmar.com

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41. SMITH's false and inconsistent publications are evidence of not only a reckless disregard for their truth or falsity, but also SMITH's malicious intent to disrupt or destroy OXEBRIDGE's business.

d. Damage to Plaintiffs' Business Interests and Value

42. SMITH has used the Elsmar.com forum to deliberately hann and disrupt OXEBRIDGE's business activity by publishing and refusing to moderate known false and misleading statements,

a. The Elsmar.com publications have directly resulted in PARIS being banned from

other websites and Internet forums, therefore limiting OXEBRIDGE's Internet presence;

b. By restricting PARIS' ability to respond to false publications, SMITH prevented PARIS from clearing OXEBRIDGE's name from false publications;

c. Multiple potential clients have posted their unwillingness to do business with OXEBRIDGE as a result of the postings by SMITH. Further, an identified potential client not familiar with the Elsmar.com withdrew from a deal with OXEBRIDGE after discovering the false material published by SMITH. The value of that contract was \$17,000;

d. As a direct and proximate result of Defendants' actions, Plaintiffs have suffered actual damages.

e. PARIS' ordinary ability to participate in industry events and industry forums has been limited due to SMITH's defamatory publications;

f. The false and misleading content has strained PARIS' relationships with industry professionals; and

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g. SMITHS's false publications have directly and proximately interfered with OXEBRIDGE's ability to do business by limiting PARIS' ability to publish effective content that would otherwise reach OXEBRIDGE's targeted fee-based market.

COUNT I

15 U.S.C. §1125 - Unfair Competition

43. Plaintiffs reallege and incorporate paragraphs 1-42 as if fully alleged in this count.

44. This is an action for damages arising from unfair competition in violation of 15 U.S.C. § 1125, brought by OXEBRIDGE and PARIS against SMITH and CAYMAN.

45. Elsmar.com (a Forum) advertises SMITH's ISO 9001 business services of CAYMAN BUSINESS SYSTEMS. Further, although the Forum's alleged purpose is to effectively provide ISO 9001 discussion at no charge to viewers, SMITH derives income from Elsmar.com and claims the valuation of CAYMAN BUSINESS SYSTEMS to be Two Million Two Hundred Thousand Dollars (\$2,200,000).

46. Both SMITH, CAYMAN and Elsmar.com are direct competitors with the Plaintiffs.

47. SMITH's publishing of false and defamatory content on a supposedly neutral international forum under the guise of "people helping people" is an improper means of competition.

48. SMITH's false postings and selective moderation of Elsmar.com has directly deceived and misled present and potential future clients of OXEBRIDGE, away from OXBRIDGE and to CAYMAN and other competitors, damaging PARIS' good name in both his business and personal communities, and the reputation of OXEBRIDGE's quality assurance business services.

49. OXEBRIDGE and PARIS have suffered and continue to suffer general and consequential damages as a result of the foregoing.

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50. The acts alleged herein have caused Plaintiffs to retain the undersigned counsel and are obligated to pay a reasonable fee for his services.

51. Plaintiffs are entitled to recover fees under 15 U.S.C. § 17. Defendants have acted in "bad faith" as SMITH engaged in economic coercion and provoked this suit, John R.

Thompson Co. v. Holloway, 366 F. 2d 108 (5th Cir. 1966), as adopted by this circuit in

Safeway Stores, Inc. v. Safeway Discount Drugs, Inc., 675 F. 2d 1160 (11th Cir. 1982).

WHEREFORE,

Plaintiffs,

OXEBRIDGE

QUALITY

RESOURCES

INTERNATIONAL, LLC, and CHRISTOPHER PARIS, demand judgment against

defendants, MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS

SYSTEMS, that:

A. Finds SMITH to be in violation of 15 U.S.C. § 1117;

B. Finds CAYMAN BUSINESS SYSTEMS to be in violation of 15 U.S.C. § 1117;

C. Awards general damages to PARIS in an amount to be determined at trial;

D. Awards general damages to OXEBRIDGE in an amount to be determined at trial;

E. Awards consequential damages including but not limited to damages arising from PARIS' inability to conduct business, maintain relationships with current and prospective clients, and maintain professional relationships within the ISO industry as a result of the Defendants' conduct, in an amount to be determined at trial;

F. Awards consequential damages including but not limited to damages arising from OXEBRIDGE's inability to conduct business, maintain relationships with

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current and prospective clients, and maintain professional relationships within the ISO industry as a result of the Defendants' conduct, in an amount to be determined at trial;

G. Finds SMITH acted in bad faith;

H. Finds CAYMAN BUSINESS SYSTEMS acted in bad faith;

1. Awards PARIS and OXEBRIDGE their reasonable attorneys' fees and costs incurred in this action under 15 U.S.C. § 1117; and

J. Grants such other and further relief this Honorable Court deems equitable and just under the circumstances.

COUNT II

Violation of §§ 772.102(1)(a)(26), 772.104(1) and 836.05, Florida Statutes (Extortion)

52. Plaintiffs reallege and incorporate paragraphs 1-42 as if fully alleged in this count.

53. This is an action for damages arising from extortion, brought by OXEBRIDGE and PARIS against SMITH and CAYMAN.

54. On May 2, 2014, in response to a written request to SMITH from OXEBRIDGE requesting the aforementioned false and defamatory content be removed, SMITH responded with an offer to sell Elsmar.com to PARIS for \$450,000.

55. SMITH's intent is clear; if PARIS declines this purchase offer SMITH would continue to spread his defamatory campaign across the Internet. This is a form of extortion.

56. When PARIS did not purchase Elsmar.com, SMITH proceeded to spread false and defamatory content on Elsmar.com and other forums and outlets such as Twitter.

57. On May 3, 2012, SMITH raised the offer Elsmar.com to PARIS to \$750,000.

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58. On October 20, 2014, SMITH raised the offer for Elsmar.com's to PARIS to \$2 million and then \$2.2 million dollars. SMITH finally raised the sale price to \$5 million.

59. Further, SMITH posted statements regarding the sale offers explaining his intent was to punish PARIS with the offer of sale. "Knowing he wouldn't have the money, I did offer to sell Elsmar to him." (See copy of email attached hereto as Exhibit "H.")

60. In violation of Section 836.05, Florida Statutes, SMITH maliciously injured PARIS' reputation by posting false, misleading and defamatory content with the intent to extort money from PARIS.

61. PARIS seeks a civil remedy for extortion, pursuant to Section 772.104, Florida Statutes.

62. SMITH's acts of extortion have caused Plaintiffs to retain the undersigned counsel and are obligated to pay a reasonable fee for his services.

63. PARIS seeks threefold the actual damages or the minimum of \$200 caused by SMITH's acts of extortion and reasonable attorney's fees and court costs, pursuant to Section 772.104, Florida Statutes.

64. OXEBRIDGE seeks threefold the actual damages or the minimum of \$200 caused by SMITH's acts of extortion and reasonable attorney's fees and court costs, pursuant to Section 772.104, Florida Statutes.

WHEREFORE,

Plaintiffs,

OXEBRIDGE

QUALITY

RESOURCES

INTERNATIONAL, LLC, and CHRISTOPHER PARIS, demand judgment against

Defendants, MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS

SYSTEMS, that:

A. Finds SMITH to be in violation of Section 836.05, Florida Statutes;

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B. Finds CAYMAN BUSINESS SYSTEMS to be in violation of Section 836.05, Florida Statutes;

C. Finds PARIS and OXEBRIDGE entitled to civil remedies for criminal practices under Section 772.104(1), Florida Statutes.

D. Finds PARIS entitled to recovery of threefold the actual damages or the minimum of \$200 under Section 772.104(1), Florida Statutes;

E. Finds OXEBRIDGE entitled to recovery of threefold the actual damages or the minimum of \$200 under Section 772.104(1), Florida Statutes;

F. Awards attorney's fees and recoverable costs of litigation incurred in this action as a consequential damage; and

G. Grants such other and further relief this Honorable Court deems equitable and just under the circumstances.

COUNT III Defamation Per Se

65. Plaintiffs reallege and incorporate paragraphs 1-42 as if fully alleged in this count.

66. This is an action for damages arising from defamation per se, brought by OXEBRIDGE and PARIS against SMITH and CAYMAN.

67. SMITH knowingly or with reckless disregard published false statements about PARIS' integrity and OXEBRIDGE's services offered.

68. SMITH acted with a reckless disregard when publishing comments relevant to OXEBRIDGE's services, as demonstrated by SMITH, admittedly not being familiar with OXEBRIDGE's services.

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69. SMITH's continuing defamation has falsely convinced others that both OXEBRIDGE and PARIS are frauds.

70. SMITH's false statements have directly impacted OXEBRIDGE's ordinary ability to conduct business.

71. OXEBRIDGE and PARIS have suffered and continue to suffer general and consequential damages as a result of the foregoing.

72. The acts alleged herein have caused Plaintiffs to retain the undersigned counsel and are obligated to pay a reasonable fee for his services.

WHEREFORE, Plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC, and CHRISTOPHER PARIS, demand judgment against Defendants, MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS SYSTEMS, that:

- A. Finds SMITH liable to PARIS for the tort of defamation per se;
- B. Finds SMITH liable to OXEBRIDGE for the tort of defamation per se;
- C. Awards general damages to PARIS for injury to his good name in the community, in an amount to be detennined at trial;
- D. Awards general damages to OXEBRIDGE for injury to its good name in the business community, in an amount to be detennined at trial;
- E. Awards consequential damages including but not limited to damages arising from Plaintiffs' inability to conduct business, maintain relationships with current and prospective clients, maintain professional relationships within the ISO industry as a result of the Defendants' conduct, in an amount to be detennined at trial;

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- F. Awards Future economic damages in the fonn of lost profits, opportunity losses, the diminution of value of OXEBRIDGE, and other damages, in an amount to be detennined at trial;
- G. Awards Attorney's fees and recoverable costs of litigation incurred in this action as a consequential damage; and
- H. Grants such other and further relief this Honorable Court deems equitable and just under the circumstances.

COUNT IV Defamation

73. Plaintiffs reallege and incorporate paragraphs 1-42 as if fully alleged in this count.

74. In the alternative to Defamation Per Se, this is an action for damages arising from defamation, brought by OXEBRIDGE and PARIS against SMITH and CAYMAN.

75. Plaintiffs seek damages arising from defamation.

76. SMITH knowingly or with reckless disregard published false statements about PARIS' integrity and OXEBRIDGE's services offered.

77. SMITH acted with a reckless disregard when publishing comments relevant to

OXEBRIDGE's services, as demonstrated by SMITH, admittedly not being familiar with OXBRIDGE's services.

78. SMITH's continuing defamation has falsely convinced others that both OXEBRIDGE and PARIS are frauds.

79. SMITH's false statements have directly impacted OXBRIDGE's ordinary ability to conduct business.

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80. OXEBRIDGE and PARIS have suffered and continue to suffer general and consequential damages as a result of the foregoing.

WHEREFORE, Plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC, and CHRISTOPHER PARIS, demand judgment against Defendants, MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS SYSTEMS, that:

- A. Finds SMITH liable to PARIS for the tort of defamation;
- B. Finds SMITH liable to OXEBRIDGE for the tort of defamation;
- C. Awards general damages to PARIS for injury to his good name in the community, in an amount to be determined at trial;
- D. Awards general damages to OXEBRIDGE for injury to its good name in the business community, in an amount to be determined at trial;
- E. Awards consequential damages including but not limited to damages arising from Plaintiffs' inability to conduct business, maintain relationships with current and prospective clients, maintain professional relationships within the ISO industry as a result of the Defendants' conduct, in an amount to be determined at trial;
- F. Awards future economic damages in the form of lost profits, opportunity losses, the diminution of value of OXEBRIDGE, and other damages, in an amount to be determined at trial;
- G. Awards attorney's fees and recoverable costs of litigation incurred in this action as a consequential damage; and
- H. Grants such other and further relief this Honorable Court deems equitable and just under the circumstances.

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COUNT V Libel

81. Plaintiffs reallege and incorporate paragraphs 1-42 as if fully alleged in this count.

82. This is an action for damages arising from libel, brought by OXEBRIDGE and PARIS against SMITH and CAYMAN.

83. SMITH's false statements intentionally misrepresent the value and manner of services offered by OXEBRIDGE to the detriment of PARIS and OXEBRIDGE.

84. SMITH has published and continues to publish libelous statements about PARIS and OXEBRIDGE on Internet blogs, forums and outlets such as Twitter, knowing the information was, and is false with a reckless disregard for the truth or falsity of such statements.

85. OXEBRIDGE and PARIS have suffered and continue to suffer general and consequential damages as a result of the foregoing.

WHEREFORE, Plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC, and CHRISTOPHER PARIS, demand judgment against Defendants, MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS SYSTEMS, that:

- A. Finds SMITH liable to PARIS for publishing libel;
- B. Finds SMITH liable to OXEBRIDGE for publishing libel;
- C. Awards general damages to PARIS for injury to his good name in the community, in an amount to be determined at trial;
- D. Awards general damages to OXEBRIDGE for injury to its good name in the business community, in an amount to be determined at trial;
- E. Awards consequential damages including but not limited to damages arising from Plaintiffs' inability to conduct business, maintain relationships with Page 17 of 21

William R. Wohlsifer, PA

1100 E Park Ave, Ste B, Tallahassee, FL 32301-2651 (850) 219-8888 - FAX (866) 829-8174

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current and prospective clients, maintain professional relationships within the ISO industry as a result of the Defendants' conduct, in an amount to be determined at trial;

F. Awards future economic damages in the form of lost profits, opportunity losses, the diminution of value of OXEBRIDGE, and other damages, in an amount to be determined at trial;

G. Awards attorney's fees and recoverable costs of litigation incurred in this action as a consequential damage; and

H. Grants such other and further relief this Honorable Court deems equitable and just under the circumstances.

COUNT VI Injurious Falsehood

86. Plaintiffs reallege and incorporate paragraphs 1-42 as if fully alleged in this count.

87. This is an action for damages arising from injurious falsehood, brought by OXEBRIDGE and PARIS against SMITH and CAYMAN.

88. SMITH knowingly published and refused to moderate false and misleading content to the detriment of PARIS and OXEBRIDGE.

89. SMITH's actions and statements demonstrate actual malice and intent to interfere with the personal interests of PARIS and business interests of OX BRIDGE.

90. In the alternative, if SMITH was unaware his statements were false, his malevolent purpose behind the published content accepts the risk of discovering whether the statements were false when made. *Collier County Publishing Co. v. Chapman* 318 So. 2d 492 (Fla. 2nd DCA 1975).

Page 18 of 21 William R. Wohlsifer, PA

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91. The false and misleading content on Elsmar.com has damaged Plaintiffs' ability to conduct business, maintain relationships with current and prospective clients and other professional relationships within the ISO industry.

92. OXEBRIDGE and PARIS have suffered and continue to suffer general and consequential damages as a result of the foregoing.

WHEREFORE, Plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC, and CHRISTOPHER PARSONS, demand judgment against defendants, MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS SYSTEMS, that:

A. Finds SMITH liable to PARIS for creating or causing an Injurious Falsehood, with malice;

B. Finds SMITH liable to OXEBRIDGE for creating or causing an Injurious Falsehood, with malice;

C. Awards general damages to PARIS for injury to his good name in the community; in an amount to be detennined at trial;

D. Awards general damages to OXEBRIDGE for injury to its good name in the business community, in an amount to be detennined at trial;

E. Awards consequential damages including but not limited to damages arising from Plaintiffs' inability to conduct business, maintain relationships with current and prospective clients, maintain professional relationships within the ISO industry as a result of the Defendants' conduct, in an amount to be detennined at trial;

Page 19 of 21 William R. Wohlsifer, PA

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F. Awards future economic damages in the fonn of lost profits, opportunity losses, the diminution of value of OXEBRIDGE, and other damages, in an amount to be detennined at trial;

G. Awards attorney's fees and recoverable costs of litigation incurred in this action as a consequential damage; and

H. Grants such other and further relief this Honorable Court deems equitable and just under the circumstances.

COUNT VII

Injunctive Relief (Temporary and Permanent)

93. Plaintiffs reallege and incorporate paragraphs 1-42 as if fully alleged in this count.

94. Plaintiffs will continue to suffer immediate and irreparable injury, in the fonn of lost business contracts if an injunction is not granted.

95. Once those contracts are lost it would be very difficult to impossible to repair said business relationships.

96. The Plaintiffs have no adequate remedy at law.

97. Since the statements are false and directly injurious to Plaintiffs' business contracts, Plaintiffs have a clear legal right to the requested relief.

98. Defendants face no hatm jf enjoined, other than losing the ability to state false infonnation

about Plaintiffs' on Eismar.com.

99. A temporary and pennant injunction will serve the public interest, by preventing false statements about Plaintiffs being relied upon by the people and business that view Eismar.com and other Internet forums and outlets.

Page 20 of 21 William R. Wohlsifer, PA

i ~oo E Park Ave, Ste 8, Tallahassee, FL 32301-2651 (850) 219-8888 - FAX (866) 829-8174

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\WHEREFORE,

Plaintiffs,

OXEBRIDGE

QUALITY

RESOURCES

INTERNATIONAL, LLC, and CHRISTOPHER PARIS request an order granting temporary and pennant injunctive relief against Defendants, MARC TIMOTHY SMITH, individually, and d/b/a CAYMAN BUSINESS SYSTEMS, that enjoins SMITH and CAYMAN:

A. From directly or indirectly engaging in any of the libelous acts set forth in this

Complaint;

B. Awards removing existing publications from Eismar.com;

C. From engaging in:1 unfair claimpetition against Plaintiffs;

D. From further mentioning of OXEBRIDGE or PARIS on Eismar.com during the

pendency of this lawsuit; and

E. Such other and further relief this Honorable Court deems equitable and just under

the circumstances.

DEMAND FOR JURY TRIAL

Plaintiffs, by and through their undersigned counsel, hereby demand trial by jury on all issues so triable as a matter of law pursuant to Rule 38 of the Federal Rules of Civil Procedure.

DATED and respectfully submitted this 31 st day of December 2014.

By: v V -u 5' ~ t' - - v tq{

William R.~

Fla. Bar No: 86827 1100 E Park Ave Stc B Tallahassee, Florida 3230 I Tel: (850) 219-8888

Fax: (866) 829-8174

E-Mail: william@wohlsifcr.com Attorney for Plaintiffs

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ramlly%3A%2(NerdLn... 111

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1212912014

Ctvls Paris - Alii again· October - December 2014 - Page 3

Post NllmiJer #17

Total Posts: 24,569

~ Re: Chris Paris - At It again - October 2014

-

Quote:

In Reply to Parent Post by .Jane8 ~

I haven't met either of you (Marc or Chris) but I read this from ChrIs (posted by you, Marc) as a reasonable request, and making some reasonable pOints.

I don't understand why you are updatng the posts, Marc. Why not just remove them?

Updatng them Is kind of provocative, to say the least. Clearly there's a long history of bad blood between the two of you, and this Is bound to up the ante.

Why not just let It go and move on?

Jane,

I have NOT updated any of the threads as he states, and you obviously did not read all the threads linked to. I have read everyone of the ones he linked to. You even posted in some of them. Vet, you read his lawyer threat from yesterday to me and apparently believe what he says. I made his email to me public specifically because he threatened me. You also have no Idea about his recent Unkedin posts and a number of recent Issues on UnkedIn other people have contacted me about with respect to Chris. You also have no idea of the other people he has threatened over the years and recently.

The people who know Chris Paris and the Iihfstorl' know better than to believe what he wrote to me in the email which r received from him Monday morning.

I will say that In the last year he did email me and asked me to remove a couple threads. It had been a long time since I had heard anything from him. I said OK and removed them. Then he emailed me a list demanding I remove a bunch more threads which in any way mentioned him. He *could* have had them removed, but threatening, vulgar phone calls, threatening emails are not the way to go about it.

In short, I did accommodate him. He then proceeded to become more aggressive and nasty. When he did that I undeleted the threads which I had deleted at his request. He chose to be nasty even after I did as he asked. I did not go Iifar enough" to please him, so he kept getting more aggressive.

As a last note, since much of what he wrote is a combination of fantasy and outright lies, pDctng his email tD me Is a form of protection. Any "actionll he would take against me will fall In a court, just as hisreportng me to the Ohio Attorney General failed back In 2004 (also see Special Concession to Chris paris of Oxebridge).

I am taking the same stance the owner of The Oatmeal did - I published his threat. Other website owners who have been threatened have done the same. Sometimes a person has to take a stance, just as I did way back in 2004 when he reported me to the Ohio Attorney General.

..:J:4:lhliil

data:tax1IhIml;cnarsct=utf-a.%3Cable%20dess%3D %22bordcr%22"k1:%30&1561\$%22%20;;eIipaddl
ng%3D%226%22%20ceIIsplacng%3D%221... 11

Case B:15-cv-00011-EAK-TBM Document 1-2 Filed 01/05/15 Page 3 of 16 PageID 25

t2I3OI2014

Chris ParIs - At it again - Ocber - December 2014 - Single Post View

Post NumI\~r II 2B

Single Post View

Total Posts: 24,571

Re: Chris Paris - At it agaIn - October 2014

Quote:

t - • ___

In Repfy to Parent Post by .JaneS f~

Yes,) did post In at least one of the threads listed, Marc.

At that time, [usecl to visIt the Cove quite often and wrote frequently and regularly In It, as you also know. I knew only what I'd read about Chris Paris In Eismar Cove from you and others: none of it was positive <snip>

If you believed the content of Chris Paris' email to me, more power to you. If you believe In "40 Day" Wonder Implementations (which is what started this some 15+ years ago), more power to you.

I have no anger at you for aligning with Chris. All I have done is state facts which contradict with his emails to me. The reality Is, if lIe had any type of "claim" against me his lawyer would have contacted me - Not Chris himself.

I believe ne is a paranoid schizophrenic. I believe he seriously needs psychiatric help.

Thanks to Marc for your InformatIte Post and/or AttachmentI Walnut

m

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Case B:15-cv-00011-EAK-TBM Document 1-2 Filed 01/05/15 Page 4 of 16 PageID 26

1~14

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Total Posts: 24,571

IIi]

Just a reminder:

Folks, PLEASE do not ask for or attach copyrighted standards or other copyrighted documents to posts and PLEASE do not offer to send anyone copyrighted standard(s) or documents bye-mall In forum posts.

In the past this has not been a significant problem, however lately more and more people are asking for copyright documents and some folks are openly offerIng to send others copyright documents via e-mail in threads. I don't want to debate whether this is right or wrong - I know many people 'trade' documents from time to time as have I.

Unfortunately, people are doing this too publicly which puts me, and the site as a whole, at risk for not controlling it.

I have been contacted by the ISO and AIAG folks In the past (granted It's been about 5 years) and they were not amused. I cannot afford a lawsuit. I know people are going to 'share' from time to time, but Please - Keep your sharing activities private. Remember, what you write In posts in public threads thousands of people can and do read.

In addition, please be very careful about anything from Chris Paris or Oxebldge. Chris Is cocked and ready for a shooting match and since his filing a complaint with the Ohio Atty General's office (Chris Paris of O)(ebrldge - Waging a Personal war), It's evident he is capable of causing trouble at any level and will do whatever he can, no matter how frivolous, to stir things up. The following Is from a post In a thread In the ASQ board ISO forum by Chris Paris of Oxebldge (for ASQ members, the link Is <http://www.asg.org/dlsc;ussion8boards!,,.D=145&tstart=0>) : "It is being exclusively reprinted on the ASQ forum board with permission of my company. other websites or forum boards are strongly advised against republishing on their sites without permission. I

myself do not have the authority to grant reprint permission, and due to recent unpermItted republishing of our articles, Oxebldge management is taking a harder stance on copyright infringement. Please ... don't risk It, folks." Actually, despite Mr. Paris' claim, I know of no web site or other venue where someone has 'republished' any of their stuff. I will say I thought his "Don't risk It folks" was typical ...

This includes LINKS to anything on Oxebldge's site - Please do NOT post any. The Oxebldge bUSINESS model is old and failing and they, as well as some other people and companies, will cause whatever problem(s) they can for this site because people like you can get all the Information they need here for free.

Oh, well I On with the show!

data:toxtlhtml;charset=utf.O.%3Ctalje%2Oclass%3D%22lbcdrer%22%201d%3D%22post90774%22%2Ckellpadding%30%226%22%2Occitspacing'Y.3D'//,,221 %... 1/1

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12J3012014

Chris Paris - AIIt again· October - Deca11ber 2014 - SInglD Post View

Total Posts: 24,571

~ Re: Chris Paris - At It again - October - December 2014

Just to make the record clear, Chris Paris does have an account here in this forum. He is not now, nor has he ever been banned here. He is able to log in and post here any time he wants to, and has been for years.

Chris just doesn't like the fact that I "outed" him 15 years ago by citing his "40 Day Implementation" spam posts In the then somewhat popular alt. quality newsgroup on USENET. He simply can not stand any discussion In which someone disagrees with him or criticism of his advertising claims.

I will say this: Chris does have some valid points which I agree with from time to time. And I'm sure Chris has some followers. More power to him.

Where Chris looses It is with his bi-polar episodes ~ where he goes off the deep end as he did in the email to in the first post in this thread. He has also telephoned me and sounded like a raving lunatic. I have a number of his emails to me which I could post, but won't. I posted the one I did because I was In a bad mood when I got up that morning and it just really was not the way I wanted to start my day. @

On the other hand, over the years he sent me a couple of "nice" email requests to delete a few posts, which I did, which started out OK, but then he went into over drive *demanding* more. Most of this has been discussed In this and other threads. Had he been diplomatic and reasonable he would have gotten his wish. As an FYI, thIs software has versioning so all changes to threads and posts are logged. I can, for example, go back and show the history of a thread, including the times I deleted some threads that he requested be deleted. But - When he then came back and wanted MORE deleted, and in rather nasty emails, I ended up "un-deleting" all the threads that he asked me to delete. Why play nice with a psychopat~7

I will say his attacks on Elsmar (me for all Intents and purposes) on Twitter and on LinkedIn are providing me a good amount of humor as of late. I hope he keeps it up. 6)'A ~

On the other hand, I *still* say his "40 Day Wonder" Implementation is misleading, to say the least, now just as it has been for around 15 years now.

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1213M014

Oxcbrldgo NG SPAM - Chris Paris - The 40 Day 'Walder' (mliementetloo - A Scam a- not? - Page 2

Post l'il101bcr :11 ='-

Total Posts: 24,571

And here Is the latest from the front:

+++++

I wasn't going to post this exchange, however it appears Christopher Paris has decided to write to individual members of the Cove forums. I present the following for everyone's amusement:

+++++

To all NG readers:

For those of you who might be interested, I place the following Into the public domain of this NG and the Internet as a whole. It is quite obvious the guy is a bit of a wingnut and I had not planned to post this partial exchange of e-mails. However, it seems Christopher has chosen to write emails to many Cayman Cove forum members. These e-mails to forum members are, of course, more of his advertising and rhetoric.

Christopher took up this cause before - last year as I remember - when he Initiated a brief hate campaign against my following the common practice of repeating Interesting news group postlgs in the Cayman Cove forums as if the News Groups are somehow copyright protected and as If fair use doesn't exist. I do this to promote dIscussion on topICS I believe are important. Many, many sites do this same thing. For almost 6 years the Cayman Cove has been helping people for free in quality assurance issues through the Cayman Cove public forums. I have spent thousands of dollars and thousands of hours of my time in order to help keep people informed at no cost to them,

Several forum members wrote me and attached copies of the advertisement Christopher sent them. As Is obvious, he got the e-mail addresses from the Cove forums. I personally don't see thIs as a big Issue but then again some others might.

If you read through, my complaint is based mainly on 3 issues:

1. Christopher SPAMs the NG - Well, we've all gotten used to him doing that so it's not a 'giant sIzed' Issue.
2. He categorizes consultants and depreciates us as if he him self is not a consultant - which he most surely is by definition. This really does get my goat, so to speak. Uke the pot calling the kettle black. I have to admIt, this really pisses me off.
3. His advertisement copyIs misleading and deceptive to say the least. The '40 day' plan is admittedly not impossible for SOME companies, but for most companies it is a pipe dream. My pappa used to tell me "If It seems too good to be true, it usually is. Make decisions carefully." Unfortunately, as we all know, some folks just can't get it through their heads that buying more magazine subscriptions does not give you a statistically better chance at winning the Publishers Clearinghouse Sweepstakes drawing.

Christopher's miracle '40 day plan' has been discussed before at some length. One such recent discussion (which was prompted by Christopher's SPAMMING the NG) is at:<http://Elsmar.com/ubb/Forum9LHTMUOOO~>

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%3CID.bIO%2Ocl1I59%30%22!bordll"%22~JOid%3D~I9324%22%~lpadding%3D%226%22"I'2Oce!ISpac!ng%3D%22 1%2. .. 1/9

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121J012014 Oxealidge NG SPAM - Chris PEltls· The 40 Day 'Warder' ImpiemcnlaUon - A Scsm or not? - pago 2

Whether or not Christopher is 'happy' about others discussing his '40 day plan' Is of no concern to me. Nor do I feel It requisite to notify everyone and every company which we discuss that they are, In fact, being discussed. That's sImply silly.

In the discussion linked to above you will note that It was started as, and continues as, a discussion of Christopher's 40 day Wonder 'program'. It Is not, as he stated In so many words, a controlled attack on his implementation methodology. Rather, It was and is a discussion of it. It Is obvious Christopher does not like such discussion unless HE can CONTROL the discussion any more than politicians want details of their programs and meetings revealed, not to mention their 'youthful Indiscretions'. It makes it difficult when someone challenges your claims and all the IFs and conditions are pOinted out. When people find out the details the smoke and mirrors fade away and the essence Is laid bare.

At one point Christopher states:

- > Your behavior on the newsgroup, your website and In
- > business only solidify my opinion of traditional
- > consultants as bottom-feeders

Gee ... We're all bottom feeders. Maybe there's a law somewhere

If you peruse his advertisement and his e-mails herein, I believe you will see who the anti-Christ is.

Christopher went to the forums, copied peoples e-mail addresses of readers and sends them each his advertising and hate e-mails. This is from his 'propaganda base' sent to many forum members:

- > I am not about to add further credence to Cayman's
- > III-adVised practice of robbing newsgroup posts to build
- > Its site content, and failing to notify the original
- > authors. Only by a thorough search did I happen to find
- > his latest thread, criticizing my company under very
- > controlled conditions. This Is certainly not a criticism
- > of the contributors, just the methods of Its moderator.

Let me first start out by again saying read the discussion thread. His claims were posted, including a link to his site. From there people made their own comments about Christopher's company's claims. I don't call this "controlled criticism".

And - Robbing NG posts? Come on, now, really. As If NGs are not public domain. Forum members know I scour NGs, Ustserve, news postlgs and many other resources for Interesting topics to bring to light for discussion. Is this my nefarious method of building my sites 'hits'? Well, I guess everyone can have a conspiracy theory. We at the Cove try to keep up with what's new. With What's happening. And what's interesting. I do this because I care. I believe in vigorous discussion. After almost 6 years on the Internet I am well past the stage where 'hIts' were Impotant. People come to the Cove, Including the forums, for Information and help. And we're there for them.

At this point I will end my narrative and let the e-mail exchanges speak for them selves.

Received: from hotmall.com (oe57.lawll.hotmall.com [64.4.16.192]) by qs9000.com (8.11.2) Id f78LY2442585; Wed, 8 Aug 2001 15:34:02 -0600 (MDT)

Received: from mall pickup service by hotmall.com with Microsoft SMTPSVC; Wed, 8 Aug 2001 14:33:52 -0700

X-Originating- IP: [24.26.87.234]

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22Iborder%22%2!Xd%3D'Y.22pos19328%22%2Occlpadding%3D%226%22%2OceiIspacIng%30 %221%2... 219

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12f3G'2014 Oxebndge NG SPM1· CITIs Paris· The40Day'Wr:rder' Impementatlon· A Scam or not7- Page 2

From: "Christopher Paris"

To: "Marc Smith"

Subject: Re: How to get ISO 9001 registered in 40 days Date: Wed, B Aug 2001 17:33:49 -0400

Marc:

I currently contract as an RAB certified registration auditor with at least two registrars of Cayman clients. I have already had to recuse myself from registration audits of these clients because of our previous interactions. The conflict of interest extends to any public comments I might make on your clients' consultant (that is, Cayman), so cannot respond to your post. I am sure that you understand this is to abide by our profession's (and the RAB's) ethical guidelines.

Rest assured, I will NOT audit a Cayman client.

As for my post, sorry I can't fulfill your desire for a fight. Let the folks on the newsgroup think you won. If you'd like to chat about this, feel free to call me at 863-651-3750.

Please do not reprint this private correspondence on your site or elsewhere; this was written for your eyes only.

Christopher

My response:

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cing%30%221 %2... 319

Date: Thu, 09 Aug 2001 08:53: 17 -0400

Subject: Re: How to get ISO 9001 registered in 40 days From: Marc Smith

To: Christopher Paris

On 8/8/01 5:33 PM, Christopher Paris at oxebrldge@hotmail.com wrote:

> Marc: >

> I currently contract as an RAB certified registration auditor with at least

> two registrars of Cayman clients. I have already had to recuse myself from > registration audits of these clients because of our previous Interactions.

Simply silly. I don't like UL because it's stringent but I'll prepare a client for them. I see no reason for you to preclude yourself from any of my clients registration or surveillance audits Simply because there are areas we personally disagree on. I see absolutely no conflict of interest there.

> The conflict of Interest extends to any public comments I might make on your > clients' consultant (that Is, Cayman), 50 cannot respond to your post.

So far, almost to a client, every registration audit has brought unsolicited positive comments from the auditors Including " ... you really got your money's worth .. ," The last registrar pulled me aside after the audit when we were at our cars leaving and told me how impressed he was with what I had done for the client. He wanted to discuss my Implementation methodologies.

I WOULdn't expect you to comment negatively without a reason and evidence. Since I have never had a client even come close to failing an audit, I'm not sure there's much you could say except that maybe you 'personally' might have done something differently. If you were to audit one of my clients I would expect you to assess them on their systems and compliance - not on who helped them.

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12I30I2014

OxcbrJdga NG SPAM • Chris Paris - The 40 Day 'Worder' Implemenlallon· A seam a nc(1- Pogo 2

> I am sure that you understand this is to abide by our profession's > (and the RAB's) ethical guIdelines.

>

> Rest assured, I will NOT audit a cayma n client.

I have no idea why not. You're supposed to be auditing them, not me. As an auditor, I would assume you would not savage a company during an audit simply because I helped them through their implementation. I would be more than happy for you, or any other auditor, to audit any of my clients - past, present or future. Raising the 'ethics' issue is a red herring and you know it.

> As for my post, sorry I can't fulfill your desire for a fight. Let the > folks on the newsgroup think you won.

It's not 'a fight'. Nor is it a matter of wi n or loose. It's a matter of sticking with facts and not name calling. It's a matter of being honest. I personally responded to your NG post because I get tired of hearing one consultant tell folks other consultants are assholes - but that you are different, that you're not a consultant. What you say may be good advertising copy, but it's not accurate and It's Inflammatory.

As I said, there are a number of threads on NGs and BBSs about your advertisement. Few say a 40 day 'implementation' is impossible (and I agree) - IF---- and a litany of IFs follows. Most simply laugh as we all know the typical company will not be 'eligible' for the 40 day program. Most are, shall we say, disappointed that you denigrate consultants as you do.

> If you'd like to chat about this,

> feel free to call me at 863-651-3750. >

> Please do not reprint this private correspondence on your site or elsewhere; > this was written for your eyes only.

>

> Christopher Paris

Bottom line is if you slam consultants you should be ready to be slammed right back.

Regardsl

Marc T. Smith

Cayman Business Systems

8466 Lesourdesville - West Chester Road West Chester, OH 45069-1929

Then I got this:

From: Bill

Subject: FW: 40-Day ISO 9000 Implementations Date: Thu, 9 Aug 2001 13:08:10 -0400

Marc,

I guess you put a burr under his saddle. As for the remark regarding "Cayman Business Systems does not sell, give away or In any way reveal/communicate any Information about anything to any person, any company or any other entity inclusive of log files, e-mail addresses and cookie information." "If that were true, I wouldn't be writing you right now.", I say who cares? He could have sent this to me using the e-mail function in the Cove. It doesn't matter. Profiles are posted, e-mails provided, voluntarrly, with Issues of confidentiality a non Issue. Go for him, as only you

data.1axtIhtm1;charset=uIf·8.%3Ct.a.ble%2Oass%30%22Iborder%22%2Oid%3D%22post9328%22"'2Oceilpadding %30%226"h22",t,,2OcaIspacing%3D%221%2... 419

Case 8:15-cv-00011-EAK-TBM Document 1-2 Filed 01/05115 Page 10 of 16 PageID 32

12I30I2014 Oxebridga NG SPM1· Chris Paris - Tii!! 40 Day 'Wonder' Impemcnta!lon. A Scam cr noI? - Page 2

know how. What a gas!

Bill

-----Original Messageh---

Then a hot one from Mr. Christopher to another Froum Member:

From: Christopher Paris

Sent: Thursday, August 09, 200111:54 AM To: wef at tenergywater.com

Subject: re: 40-Day ISO 9000 Implementations

I am not about to add further credence to Cayman's iII-advised practice of robbing news group posts to build its site content, and failing to notify the original authors. Only by a thorough search did I happen to find his latest thread, criticizing my company under very controlled conditions. This is certainly not a criticism of the contributors, just the methods of its moderator.

Anyone Interested in details of 40-Day Implementations email me directly. I would be glad to talk about Rapid Implementations, nut from a sales or marketing aspect, but to answer your specific questions. There are no "secret tricks." I can tell you I am honestly and totally astounded that it would take any consultant MORE than 40 days to implement ISO 9000, and might have a few questions of my own for you.

You may also wish to review Cayman's published privacy policy against its practice:

"Cayman Business Systems does not sell, give away or In any way reveal/communicate any Information about anything to any person, any company or any other entity inclusive of log flies, e-mail addresses and cookie information."

If that were true, I wouldn't be writing you right now. Christopher

-

This is a private communication, not to be reposted in any public forum without the author's approval.

I guess Christopher is fishing for customers from Cove forum participants.

Date: Thu, 09 Aug 200113:46:40 -0400 Subject: Re: 40-0ay ISO 9000 Implementations From: Marc Smith

To: Bill

Well, he's written me twice - I responded once. Shall we say BIG BURR in the 01' saddle I I had no Idea he responded

to you as well

date.:tex1Jh1ml;char&et=utf-a.%
3CIIBIe%2OdBSS%3D%22borckl'%22%2OId%30%22pos1932B%22%2OccIipaddlf19%30%226%22%2OceIspacing
%30%221"1.2... &9

-> "Cayman Business Systems does not sell, give away or In

-> any way reveal/communicate any Information about anything

-> to any person, any company or any other entity inclusive

-> of log files, e-mail addresses and cookie information."

-> "If that were true, I wouldn't be writing you right now."

This is basically true in the case of e-mails - there are a lot floating around but that's pretty much routine and they are not used for tracking or sold or anythIng. But yeah - he's being a pompous *** as far as I'm concerned. Not to mention that, like is so often done in politics and

Case 8:15-cvM00011-EAK-TBM Document 1-2 Filed 01/05/15 Page 11 of 16 PageID 33

12/3012014 Oxebldge NO SPMi· Chris Paris· The 40 Day 'Wcnfer' ImpemenalJoo- A Scam or noI7 M Page 2

the news, Christopher cites one part of the Cove privacy policy

(<http://EIsmar.com/entry2.htmlat> the bottom of the page), takes it out of context and - well, you've seen It before so It's like listening to Rush.

I honestly wanted to **** him off and I told him why. I do not like fools like him berating consultants when he himself Is one. His SPAMMING the NG 15 not surprising - he does It now and again. But like I say - he uses "fight!n' words" in his advertisement copy. I'd shut up if he didn't use such bull in his SPAM. Our exchange went like this (my reply to his first e-mail - which, of course, includes his original text to me):

Here I copied him on Christopher's e-mail to me and my response above. *****

NOW - if you want to talk about a burr in his saddle, he then sent me the following (which ,I really haven't read in detail and don't plan to respond to - although I would LOVE to In public just to REALLY **** him off ... This has reached the absurd. Anyway, here's his last epistle to me:

Marc:

For reasons only known to you, you've personalized the debate. You take my criticisms of consultants as a whole as a personal Insult, and respond with personal attacks, accusations, false quotes, Intentional misinterpretations and (worse stili) vulgarity. You have consistently and publicly represented me personally as a liar, with the direct intent to dissuade companies from using me personally; that Is quite a different tack to take then pointing out deficiencies In an Industry, and the legality of that tack is In question. You have subsequently insulted all of our current clients In the process. And you blithely drop your own clients' names while doing it, which is an inexcusable ethical error.

Not sure why you aren't aware of the professional ethics gUidelines, but I am. Your clients are better for It.

Your behaViour on the newsgroup, your website and In business only solidify my opinion of traditional consultants as bottom-feeders who have to pick fights to gaIn clients. That's not what my company Is about, and exactly the reason I distance myself from your ilk. You'll note, however, that I give you the respect not to publicly air my opinion of you personally, which is why (again) I disallow you from reposting this private email In any forum.

Does this mean I won't market or contribute on the newsgroup? Not at all. In fact, I appreciate that your posts satisfy two major needs for me: (1) they drive hits to my site, and (2) they prove my pOint about consultants. But I could do without the libel.

As for any threads regarding our programs, I only contribute to that single newsgroup. If you have transported them again to your own commercial forum in order to boost your site's content & traffic, and to criticize my company &

clients behind their backs, you have not (again) notified me as per my previous request. And thaes *exactly* the kind of behaviour that (thankfully) separates folks like you and myself.

*****~*****

-----Original Message-----From: Marc Smith
Sent: Thursday, August 09, 2001 11:47 PM To: Bill Fennelly
Subject: Re: 40-Day ISO 9000 Implementations

Well, he's written me twice - I responded once. Shall we say BIG BURR in the 01' saddle! I had no Idea he responded to you as well!

- > "Cayman Business Systems does not sell, give away or In
- > any way reveal/communicate any information about anything
- > to any person, any company or any other entity inclusive
- > of log files, e-mail addresses and cookie information."
- > "If that were true, I WOULdn't be writing you right now."

this Is basically true In the case of e-mails - there are a lot floating around but that's pretty much routine and not used for tracking or sold or anything. But yeah - he's being a pompous *** as far as I'm concerned.

I honestly wanted to **** him off and I told him why. I do not like fools like him berating consultants when he himself Is one. His SPAMMING the NG is not surprising - he does it now and again. But like I say - he uses "fightin' words" In his advertisement copy. I'd shut up If he didn't use such. buIJ**** in his SPAM. Our exchange went like this (my reply to his first e-mail ~ which, of course, Includes his original text to me):

Date: Thu, 9 Aug 2001 12:06:33 -0700 (PDT) From: James
To: Christopher Paris
Subject: re: 40-Day ISO 9000 Implementations

Christopher,

I wish I knew what you were talking about. By the way, what company do you represent? Sounds like P,J.

Cayman Cove is just a group of people, some new and some professionals that try to help juggle the specifics of the different quality systems. Anything that is posted is posted by members and people trying to untangle the regulations.

ASD ...

So folks, that's the scoop.

As Fox News says: We Report - You Decide!

+++++

Regards!

Marc T. Smith

Cayman Business Systems

8466 Lesourdesville - West Chester Road West Chester, OH 45069-1929

*****~*****~*****

Whether or not you are the intended recipient, you and I both know you can read, copy, or use it, and disclose It to anyone you like. You can post It on the Internet or in any public forum or venue in any format, Including, but not limited to, electronic, internet, print, or photocopy, on your local grocery store public postings board or anywhere else. To think an e-mail is anything otherwise Is silly wishful thinking only a lawyer or a fool would expect. If you have something to hide from

the public, I suggest you consider another method of communication. But remember - Even a FAX can be easily intercepted.

dala:1.a>M1Im1;charset::utf-8. %3C~D%2Oclass%300/022lbader%22%2Oid%3D %22pos19326%22"k2Ocoilpadding% 3D %226°.22%2Oce1ls paclng%3D%221 %2. .. 919

In Reply to Parent Post by Marc (Post 561236)

Chris Paris likes Chris Paris. Essentially Chris Paris Is a paranoid stalker Why else would he visIt here? He doesn't like me and wants me to remove all negative posts nere about nrm and/or his company. He even asked me how much \$ I wanted to remove the threads he and/or hIs company are mentioned in. Especially the "40 D.:Iy Wonder- thread from something like 15 years ago.

- . - - - ~-, 16th October 2014 01:42 AM

Re: "What to do about this forum - Part n"

Quote:

Yes, all true. Oddly, though, he and his corroany stili survive when countless others have turned Into little balls of dust under the bed. I stili laud hIm for some really creative parodies, especially the one spoofing ISO, called Eyesore.

If he's dishing out pure bunk, some folk.<; who shOUld knew better are buylr.g his stuff. HIs latest blurb lists clifmts as:

an ISO 9001 and AS9100 consulting nrm whose clients Include SpaceX, Lufthansa, L3 COmnJnicatIons, and rrore than 200 small and medIum sized organIzatIons.

Heck, at my peak, I never had rrore than 30 consulting clients In a year. Consulting takes time and effort, but the marketIng, negotiating, and logIstics of running a consultIng business take rrore tIme If the consultant Is really actIng as a consultant and adviser, not 1ust a publisher of boiler plate documents desIgned to pass

rriInrrulTI rTI.Jster with an outsIde audIt team taking a brief snapshot of a company. J

I'd dearly love a tete a tete with sorreone at Space X for a frank assessment of the value

received. :evidence: ???

Marc

16th October 2014 02:34 AM

Re: "What to do about this forum - Part nn

There Is always someone watchIng TV at 2 In the rmmlng who will send their mmeY for the nMIracle Cure". That Is the Oxebddge NcwsGoooun SPAM - Chris pads - Ihe 40 pay Wonder' Implementation - A Scam or oor' I spoke agaInst many years ago. It Is that thread that stili has Chrts Parts "unhappyu.

I have no doubt that his company has had a lot of successful Irrolementations over the years. My orl~Inal complaint, so to speak, was essentlaUy related to "fillse advertIsing", and that was back In the newsgroups back seme 15 years ago. Forty Days - Can be done, but rarely.

I say: Let Chris Parts be Chris Paris. His/hIs company's successes are real. Then agaIn, In all my vears of

Post Number #58

26th January 2015, 01:17 PM



Marc

Total Posts: 24,611



Re: Chris Paris - At it again - October - December 2014 and January 2015

Quote:

*In Reply to Parent Post by **True Position***

If you'd like more laughs, here's his lawyer's twitter:

<https://twitter.com/wohlsifer>

Florida's First Libertarian Candidate For Attorney General - Running on the concepts of legal pot and Bitcoin.

By golly, not surprising.

Can you say "Frivolous Lawsuit"??

Post of other www.Elsmar.com user(s) removed to shorten the record

Post Number #65

26th January 2015, 03:45 PM



Marc

Total Posts: 24,611

Re: Chris Paris of Oxebridge - At it again - October - December 2014 and January 2015

Quote:

*In Reply to Parent Post by **Mark Meer***

Am I the only one thinking this is all going a bit far?

...sure, we can post laughable links and LOL icons while poking fun at this guy, but it seems to be at the point where there can be some real damages.

Marc, while I'm totally on your side with regards to defending your position and principles, hasn't it reached the point where there are some very real costs that might outweigh the continuance of this situation.

Forgive me if I'm ignorant of your legal system, but it seems to me that a formal lawsuit and court-summons with, among other things, \$75,000 on the line (not to mention legal costs), is not something to be joking about.

At the very least, I (humbly) suggest you don't unnecessarily incite or provoke at this point (for example, posting private emails that Chris has explicitly not wanted made public). Sure, stick to your principles on the allegations, but I see no benefit in escalating the conflict at this point.

For all the joking in this thread, I'd hate for you to have to experience the personal and financial strain of legal actions...

I'm meeting with my lawyer tomorrow.

Chris Paris has escalated the situation. I have done no more than publish one of his nasty emails to me. While Chris Paris may not want his emails to me to be public, he has forced the action and he has no expectation that his emails to me will be confidential. Had he let sleeping dogs lie, none of this would be taking place. His latest "hit piece" on me on his website:

Quote:

*In Reply to Parent Post by **Chris Paris of Oxebridge on his website***

Official Statement on Oxebridge Extortion Suit Against Elsmar.com and Marc Smith

by OQRI | Jan 26, 2015 | News |

The following is a limited official statement from Oxebridge regarding its extortion lawsuit against Marc Smith and Elsmar.com. Oxebridge will be limiting its comments on the matter until the suit is resolved.

Since 1999, Cayman Business Systems owner Marc Smith has falsely accused Oxebridge and myself of fraud and deceptive advertising, among other false accusations. Throughout that time, we tolerated this, out of respect for Elsmar's guests. However, in 2014, Smith began to escalate the libel campaign after Oxebridge refused his demand to pay him \$450,000. Oxebridge views this as nothing less than felony extortion. Worsening matters, a supporter of Elsmar — who himself is a convicted felon — had threatened to call an Oxebridge client with the intent of defaming us through that medium, as well. These two actions combined proved too much for us to bear.

Marc Smith has published tens of thousands of words on his site, Elsmar.com, defaming Oxebridge. Meanwhile, no one from Oxebridge has ever posted a single word on the Elsmar site, in that entire period. Not one word. In addition, we have never run a single article on Elsmar here on the Oxebridge site, despite Elsmar being central to certain investigations over CB collusion with consultants. We have consistently worked to keep Marc Smith and Elsmar at arm's length, in the hopes that he would end his libel campaign. It clearly did not work.

We understand the difference between defamation — which is illegal — and free speech and opinions, which are protected under the US Constitution. However, the posts made by Smith and his moderators breach the definition of free speech by being (a) false, (b) posted with malicious intent, and (c) intended to cause harm.

The combination of extortion and threats by a convicted felon against Oxebridge clients was too much. A cease and desist letter was sent to Smith, who responded — on his website — by raising his demand to \$5 million.

In the meantime, the actions have not been called into question by any of Elsmar's moderators, many of whom have actively participated in the defamation. Perhaps not coincidentally, these moderators are also auditors or sales representatives of major ISO 9001 certification bodies who resent the reporting done by Oxebridge. These individuals include Randall Daily of BSI, Jennifer Kirley of UL, Sidney Vianna of DNV, and Andy Nichols of NQA-USA. Meanwhile, all four of those CBs receive advertising space on the Elsmar site, raising questions as to whether BSI, UL, DNV and NQA have breached the ISO 17021 prohibition against promoting one consultant, while actively denigrating and defaming activities against a consultant that did not offer them such perks.

It is not our intent to shut down Elsmar, which has served the quality profession well in the past decade, despite the misbehavior of its owner. However, potential federal felonies cannot go unpunished, and Oxebridge intends to ensure that this stops. We have exhausted all means of working with Smith on this issue, and have finally had to resort to using the courts.

If Smith were instead to simply remove the offending materials and cease all such activity, the problem could be resolved quickly, and Elsmar users would be utterly unaffected. Based on his past 15 years' of behavior, we feel that is unlikely, however.

In the coming days and weeks, Smith will no doubt return to his safe haven, and post with increased frequency an unprecedented amount of new defaming material. We know this, and are ready to withstand it. Predicting this, we have already begun to push for an immediate temporary injunction. The new material will be added to the existing court complaint.

We intend to push for a firm resolution to this problem, including the pursuit of criminal charges against Smith and his collaborators. We have likewise not ruled out actions against DNV, BSI, UL and NQA-USA for allowing their representatives to contribute to defamation and extortion.

— Christopher Paris

Post Number #66

26th January 2015, 03:59 PM



Marc

Total Posts: 24,611

Re: Chris Paris of Oxebridge - At it again - October - December 2014 and January 2015

Quote:

In Reply to Parent Post by Mark Meer

I presume they are all just the result of PDF-to-text translation software.

I'm sure they are. The scanned .pdf documents are linked to in this discussion thread: <http://elsmar.com/Forums/showthread.php?t=66511> - Scanned .pdf version here: [http://elsmar.com/pdf_files/Chris Pa...suit_20150125/](http://elsmar.com/pdf_files/Chris_Pa...suit_20150125/) They are public records.

I'm not the only person he is threatening. Not to mention, he has things like this to deal with: <http://www.ripoffreport.com/r/oxebri...xebrid-1062892>

Attached Files: 1. [Scan for viruses before using](#), 2. Please report any 'bad' files by Reporting this post, 3. Use at your Own Risk.

[Ripoff Report on Oxebridge Quality Resources Complaint Review Tampa, Florida 1062892.pdf](#) (1.39 MB, 7 views)

Post of other www.Elsmar.com user(s) removed to shorten the record*

Post Number #68

26th January 2015, 05:51 PM



Marc

Total Posts: 24,611

Re: Chris Paris of Oxebridge - At it again - October - December 2014 and January 2015

Sometimes one has to stand on principle. I'll wait and see what my lawyer has to say.

Post of other www.Elsmar.com user(s) removed to shorten the record*

Post Number #72

27th January 2015, 12:16 AM



Marc

Total Posts: 24,611

Re: Chris Paris of Oxebridge - At it again - October - December 2014 and January 2015

I appreciate your concern, Golfman, but I have read through the complaint thoroughly and have annotated it. I won't go into details but it's going to be a wash. There are so many problems with it that even I'm amazed.

As to the money, I'm in my 60's and divested myself of everything several years ago preparing for my old age. I don't have any money or assets that Chris Paris can get. While Chris has succeeded in getting my dander up again, it's no big health issue.

Chris wanted to stir the pot again, so.... I'll deal with it. He should have let this all die back in 2004 when he filed the complaint with the Ohio Attorney General which was killed.

Like I said - I meet with my lawyer tomorrow and will go from there.

Post Number #73

28th January 2015, 03:08 AM



Marc

Total Posts: 24,611

Re: Chris Paris of Oxebridge - At it again - October - December 2014 and January 2015

In general, this is an update to all.

Quote:

*In Reply to Parent Post by **Golfman25***

Look, I understand principle and all. But this is a loose/loose situation. While truth is a defense, even if you "win" the time and money will be wasted. **He gave you an out via. his website post.** I'd take him up on it.

I have a screen capture and a .pdf of that. This public post on Chris Paris' website backs up his "offer" on his website page.

Preliminary critique of Chris Paris' offer to rescind his Federal "Civil A against me if I meet his "demand". 2015-01-28 Revisior

Official Statement on Oxebridge Extortion Suit Against Elsmar.com and Marc Smith



Blog v Services v Resources v Champion Projects v Public Speaking v About / C

The following is a limited official statement from Oxebridge regarding its extortion lawsuit against Marc Smith and Elsmar.com. Oxebridge will be limiting its comments on the matter until the suit is resolved.

This started in 2001, not 1999. Prior to 2001, after I had essentially retired from consulting, I had no idea who Chris Paris was. Since 1999, Cayman Business Systems owner Marc Smith has falsely accused Oxebridge and myself of fraud and deceptive advertising, among other false accusations. Throughout that time, we tolerated this, out of respect for Elsmar's guests. However, in 2014, Smith began to escalate the libel campaign after Oxebridge refused his demand to pay him \$450,000. Oxebridge views this as nothing less than felony extortion. Worsening matters, a supporter of Elsmar — who himself is a convicted felon — had threatened to call an Oxebridge client with the intent of defaming us through that medium, as well. These two actions combined proved too much for us to bear.

"Tens of thousands"? You have got to be kidding me.

Marc Smith has published tens of thousands of words on his site, Elsmar.com, defaming Oxebridge. Meanwhile, no one from Oxebridge has ever posted a single word on the Elsmar site, in that entire period. **Not one word.** In addition, we have never run a single article on Elsmar here on the Oxebridge site, despite Elsmar being central to certain investigations over CB collusion with consultants. We have consistently worked to keep Marc Smith and Elsmar at arm's length, in the hopes that he would end his libel campaign. It clearly did not work.

We understand the difference between defamation — which is illegal — and free speech and opinions, which are protected under the US Constitution. However, the posts made by Smith and his moderators breach the definition of free speech by being (a) false, (b) posted with malicious intent, and (c) intended to cause harm. **Who is this convicted felon?**

The combination of extortion and threats by a convicted felon against Oxebridge clients was too much. A cease and desist letter was sent to Smith, who responded — on his website — **by raising his demand to \$5 million.**

In the meantime, the actions have not been called into question by any of Elsmar's moderators, many of whom have actively participated in the defamation. Perhaps not coincidentally, these moderators are also auditors or sales representatives of major ISO 9001 certification bodies who resent the reporting done by Oxebridge. These individuals include Randall Daily of BSI, Jennifer Kirley of UL, Sidney Vianna of DNV, and Andy Nichols of NQA-USA. Meanwhile, all four of those CBs receive advertising space on the Elsmar site, raising questions as to whether BSI, UL, DNV and NQA have breached the ISO 17021 prohibition against promoting one consultant, while actively denigrating and defaming activities against a consultant that did not offer them such perks. **Spreading FUD and making unfounded, dilusional accusations (fling mud against the wall to see what sticks).**

It is not our intent to shut down Elsmar, which has served the quality profession well in the past decade, despite the misbehavior of its owner. However, potential federal felonies cannot go unpunished, and Oxebridge intends to ensure that this stops. We have exhausted all means of working with Smith on this issue, and have finally had to resort to using the courts.

If Smith were instead to simply remove the offending materials and cease all such activity, the problem could be resolved quickly, and Elsmar users would be utterly unaffected. Based on his past 15 years' of behavior, we feel that is unlikely, however. **A very public offer to "settle". Some would say blackmail..**

Safe Haven? A 2 bedroom cottage on 1/2 acre in northern Cincinnati?

In the coming days and weeks, Smith will no doubt return to his safe haven, and post with increased frequency an unprecedented amount of new defaming material. We know this, and are ready to withstand it. Predicting this, we have already begun to push for an immediate temporary injunction. The new material will be added to the existing court complaint.

We intend to push for a firm resolution to this problem, including the pursuit of criminal charges against Smith and his collaborators. We have likewise notified our actions against DNV, BSI, UL, and NQA-USA for allowing their representatives to

I don't now how you read the above, but to me most of what Chris Paris wrote is malicious slander. Because Chris Paris is being (my opinion) anal about all of this, I suppose it would be wise of me to ensure in the future I will include the "...in my opinion..." words in there so he can not claim "slander". I am allowed my opinions, but Chris Paris has brought "nittism" to the point that "...the definition of what the word 'is' is..." becomes an issue. Do I really have to put "...this is my opinion..." when I say something about him?

I have spoken with my lawyer here in Cincinnati and a lawyer in Florida. This is a federal lawsuit so it is definitely a serious matter and will be expensive. Whether I take the "easy way out" (submit to blackmail) is on my mind. I can also simply close Elsmar down which would meet Chris Paris' "offer".

In short, yes. Right now it is a quandary as to which path I follow.

I do want you to know that I do appreciate your advice, and it is probably the easiest way to meet Chris Paris' "offer". Money wise, as I have been educating myself, you are right - It will cost me US\$10,000 minimum for basic representation, and it is likely costs would possibly exceed US\$100K. Not to mention, I live in Cincinnati, quite a long way to Florida where, if the suit is accepted by the court and a trial date set, I would have to travel to and "live" somewhere during the trial. The reality is I couldn't afford it. So, right now I'm thinking close Elsmar, Chris Paris will have to meet his very public "offer" to drop the lawsuit, and get on with my old age.

On the other hand, he and/or his lawyer may see things differently when they find out I divested assets in 2011 so my net worth is my house (which I **should** have put into trust). They will find out, if they aren't already aware, that on the open market Elsmar.com would bring in **maybe** US\$10K in today's market. Offers I made to him, should he want to **buy** Elsmar, were highly inflated. That is my prerogative, though. If I own a car which Kellys says is worth US\$500, that doesn't mean I can't try to sell it to someone for US\$5000. In some email exchanges I lied to Chris Paris. I very much exaggerated my available net worth. I do believe that is a significant part of this. I think Chris Paris thinks I'm rich, and I do not deny having given him that impression. This came down to mind games.

Even if I do not respond to the court all he can do with a default judgement is put a lien on my house (as I understand it, but I could be wrong), my only asset other than my car. I *assume* he may be able to seize my bank account, but since I keep very little money in the bank, that is only a few thousand bucks.

Note that Chris Paris says I kept raising the price to sell him Elsmar. I did. It was funny. A website worth maybe US\$10K on the market today, but, since I personally don't like Chris I set him a high price because selling it to him would be a blow to my reputation. The price went up every time he bothered me again. Chris labels it "extortion". I call it "...if you bother me again the price will go up again...", but I will sell it to you to the detriment of my reputation for doing so.

There was not, and this isn't extortion. I offered to sell Elsmar to Chris. Nothing more, nothing less. I have the email exchanges to prove it.

To me, this is Chris Paris:

Oxebridge Quality Resources | ISO 9001, AS9100 implementation, consulting and training since 1999.

Real Time Availability Clock

We're so popular right now, our earliest start date is

02 MAR. 2015

Don't freak! You could still be certified by

➔

MAY 2015

 ➔



Twitter Feed

Subscribe to The Oxebridge Report

Get more insider information, hard hitting opinion, and reporting as only Oxebridge can do it. It's free, and your information is never used for any other purpose.

Sign Me Up!

It's what the [July 2001 thread](#) (Thread Title: Oxebridge NG SPAM - Chris Paris - The 40 Day 'Wonder' Implementation - A Scam or not?), which started all of this, is about - False/deceptive advertising.

I will admit - I fell for Chris' baiting me into this situation. I never claimed to be a smart person. I'm pretty dumb. I have said so in quite a few posts. That's just me. I am. I admit it.

As a last comment, in 2004, in his [Complaint to the Attorney General of Ohio](#) Chris Paris accused me of

"potentially aiding terrorists". Quite a stretch and quite an accusation. See the attachment.

Then came his 2014 (the current) "problem". That's in large part why I said my opinion is that he is bipolar or something. I'm not a doctor. I have no idea. What I did, and am doing, is saying my **opinion** is he is bipolar or something.

2001 (3 month discussion) > 2004 (complaint to the Attorney General of Ohio) > Current 2014-2015 "episode".

Where from here? Time will tell...



Attached Files: 1. [Scan for viruses before using](#), 2. Please report any 'bad' files by [Reporting this post](#), 3. Use at your Own Risk.

 [Nancy fax-2004 Paris Complaint Reply-Must Read.pdf](#) (293.9 KB, 13 views)

Last edited by Marc; 28th January 2015 at 03:27 AM. Reason: Add content and clarify some things.

Post Number #75

29th January 2015, 03:59 PM



Marc

Total Posts: 24,611

Re: Chris Paris of Oxebridge - At it again - October - December 2014 and January 2015

He is calling Wes Bucey a convicted felon, not me. He did that in a "tweet" as well not too long ago. I think he deleted it but I have screen shots of it. Obviously it's Wes' decision as to whether he wants to take action or ignore it.

This is a Federal lawsuit so Florida law is not always applicable.

I don't particularly care what he says about me or Elsmar, so I have little desire to sue him for anything. Since I am sure he will read this, I will say I will definitely not rule it out. I would prefer to simply end this. It's a hassle. It's expensive. He stated on his web site: "If Smith were instead to simply remove the offending materials and cease all such activity, the problem could be resolved quickly,...". Should I receive notice that the lawsuit has been withdrawn, I will remove the "offending" discussion threads. It's not worth the fight to me. My opinion is Chris Paris is negatively affecting his own reputation by pursuing this and it won't change because I delete "offending" threads/posts here in this forum. He has been splattering Twitter with negative comments about me and Elsmar. My opinion is he will experience the "Streisand Effect", and that it will negatively affect him, but it is his choice to do that.

But I seriously doubt he will "go first" and withdraw the lawsuit so I am continuing to prepare for his not withdrawing his lawsuit against me. My lawyer and I are already at line item 44 out of the 99 line items in the complaint in the "Answer and Counterclaim" to the summons which I have to submit to his lawyer and the court. No way I will allow a "default judgement" by not completing and submitting the required "Answer and Counterclaim".

Post of other www.Elsmar.com user(s) removed to shorten the record*

Post Number #79

30th January 2015, 11:18 AM



Marc

Total Posts: 24,611

Re: Chris Paris of Oxebridge - At it again - October - December 2014 and January 2015

At one point in the suit he literally claims I can and do purposefully control Google search rankings so that when someone searches for Oxebridge that threads here referencing his company come up. If I had any control over Google search results I'd be sitting pretty. I do think I know why it is happening, but I won't share it here because I have no intention of telling him - And - It's just my opinion of why.

Anyway, the "Answer and Counter Claim" is written. It has to be cleaned up a bit but it will be sent to his attorney and the court early next week so that will be good. That will eliminate a summary judgement by ignoring the whole thing. I would like to share it here, but at this stage I don't know if it is considered a "public" document. Nor do I want Paris and his attorney to see it before the Judge get his copy.

Jennifer, you and several others are singled out which, in my opinion, it to try to get advertisers to cancel and to continue his crusade (for lack of a better word) against several major companies. As well, my opinion, it is to further the idea that a group of us had singled Paris and Oxebridge out to gang up against him. He totally misses that Chris Paris himself is, and has, caused his own problems.

On the other hand, I was stupid in that I let him bait me into this.

From there, I don't know. He wants a jury trial.