

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING

OCT 13 2022  
1:51 P.M.  
Margaret Botkins, Clerk  
Cheyenne

WILLIAM DALE MACLEOD		
PLAINTIFF		
VS.		CASE NUMBER: 22-CV-207-F
LOLCOW LIMITED LIABILITY CORP-		
ORATION O/A KIWI FARMS		
DEFENDANT		

**AMENDED COMPLAINT**

I, William Dale MacLeod, of the City of Etobicoke, in the Province of Ontario, Canada, a Diversity Plaintiff, proceeding *In Forma Pauperis*, **FILES THIS AMENDED COMPLAINT IN ACCORDANCE WITH THE ORDER OF THE COURT DATED THE TWENTY-SECOND DAY OF SEPTEMBER 2022:**

Summary of Facts and Material Allegations:

- 1) The Plaintiff claims not more than One Hundred Thousand Dollars and Zero Cents personally against the defendant, under the Federal Rules of Civil Procedure, whereas:
  - a) The Defendant, and users of the Defendant’s site Kiwi Farms (the defendant collectively referred to as Kiwi Farms herein) had knowingly defamed the Plaintiff by permitting to be published, and publishing, information that is known to cause irreparable harm to the Plaintiffs’ reputation, cause the Plaintiff mental anguish and cause social and economic deprivation due to the public availability of this information. This includes but is not limited to:
    - i. Falsifying, Exaggerating or Misinterpreting information respecting the Plaintiffs’ previous filings before a separate United States District Court,
    - ii. Falsifying, Exaggerating or Misinterpreting information respecting the Plaintiffs’ opinion pieces, posted publicly on LinkedIn,
    - iii. Falsifying, Exaggerating or Misinterpreting posts made on the Plaintiffs’ social media, excluding opinion pieces posted on LinkedIn,
    - iv. Making derogatory statements about the Plaintiffs’ indigenouness,

- v. Making derogatory statements about the Plaintiffs' online and in-person persona, to degrade or humiliate the Plaintiff, and
- vi. Engaging in any other act, error or omission which the Plaintiff is not aware of at the time of filing or at the time which the defendants' server is no longer supported and operational.
  - a. Of which, all the acts, errors or omissions were committed to defame and dehumanise the Plaintiff, which the Plaintiff may never fully recover from.
- b) The Plaintiff, being at risk of suffering the continued effects of this campaign of defamation by Kiwi Farms, has decided to change their name in their province and country of residence. This is not the Plaintiffs' full reason, but it plays a large factor in the decision-making process.
- c) Kiwi Farms, being publicly known, and acknowledging its existence, as an Internet Forum which facilitates the "discussion" and "harassment" of online figures and communities, condones, encourages, and engages in the commission of criminal harassment (stalking and trolling), identity theft and fraud (doxing), misuse of emergency services (swatting), aiding or abetting suicide by the concomitant commission of other criminal acts.
- d) Kiwi Farms, by knowingly sanctioning cybercrime and [physical] crime to occur, and engaging in it, is not protected by the First Amendment of the United States Constitution, and as a Limited Liability Corporation, is not permitted to claim freedom of speech or the expression of opinion as it is not an individual and it cannot claim freedom of the press as it is not a journalistic organization or journalist.
- e) Kiwi Farms cannot be protected from liability under any constitutional provision of the United States of American or of the State of Wyoming, under any statute or provision. The Plaintiff intends on exercising their rights as enshrined by law.

**Jurisdiction of the Court:**

- 2) The Plaintiff, being a Diversity Plaintiff, has the United States District Court as their only form of recourse in the State of Wyoming, as only a summons be served against an individual in a foreign country or a deposition be made by a foreign individual or where it is a question of foreign law application to a specific case (§§4(f), §§28(2)(b) and §§44 of the Wyoming Rules of Civil Procedure). No part of the Wyoming Rules of Civil Procedure applies to the Plaintiffs specific criteria in this matter.

- 3) The Plaintiff, being a Native American born in Canada, is subject to §290 of the Immigration and Nationality Act, and upon entry to the United States of America, or upon presentation of a Lawful Permanent Residence (Green) Card, is subject to American Laws. However, with current residence being outside the United States, the Plaintiff is subject to the Diversity requirements as set in the Federal Rules of Civil Procedure.

Date: October 4 2022



William Dale MacLeod

#315-25 Mabelle Avenue

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Canada

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**FULFILMENT OF REQUIREMENTS SET OUT IN THE ORDER OF THE COURT  
DATED THE TWENTY-SECOND DAY OF SEPTEMBER 2022**

The Plaintiff, William Dale MacLeod, certifies on this Fourth Day of October 2022, that this Amended Complaint fulfils the order of the court issued the Twenty-Second Day of September 2022.

Signed on the Fourth Day of October 2022 at the City of Etobicoke, in the Province of Ontario, Canada



William Dale MacLeod



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*William MacLeod*

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