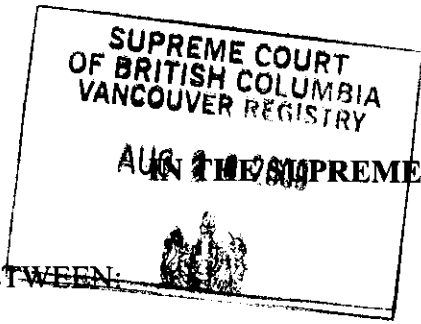


S-096324
No.
Vancouver Registry



SUPREME COURT
OF BRITISH COLUMBIA
VANCOUVER REGISTRY

AUG 11 2009 SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

THE PHS COMMUNITY SERVICES SOCIETY

PLAINTIFF

AND:

**COLIN MANGHAM, DRUG FREE AMERICA FOUNDATION, INC.,
CHUCK DOUCETTE, THE MINISTER OF PUBLIC SAFETY AND
SOLICITOR GENERAL OF BRITISH COLUMBIA, HER MAJESTY THE
QUEEN IN RIGHT OF THE PROVINCE OF BRITISH COLUMBIA and
JOHN/JANE DOE OFFICER**

DEFENDANTS

WRIT OF SUMMONS

Name and address of each plaintiff:

THE PHS COMMUNITY SERVICES SOCIETY
20 West Hastings Street
Vancouver, BC
V6B 1G6

Name and address of each defendant:

COLIN MANGHAM
c/o Drug Prevention Network of Canada
207 Bank Street, Suite 331
Ottawa, Ontario
K2P 2N2

DRUG FREE AMERICA FOUNDATION, INC.
5999 Central Avenue, Suite 301,
St. Petersburg, Florida
33710

28AUG09 927170 RISS 208.00
21422 5096324

CHUCK DOUCETTE
c/o The Minister of Public Safety and Solicitor General of British Columbia
PO BOX 9282 STN PROV GOVT
City of Victoria

BC V8W 9J7

THE MINISTER OF PUBLIC SAFETY AND SOLICITOR GENERAL OF BRITISH
COLUMBIA
PO BOX 9282 STN PROV GOVT
City of Victoria
BC V8W 9J7

HER MAJESTY THE QUEEN IN RIGHT OF THE
PROVINCE OF BRITISH COLUMBIA
11th Floor, 1001 Douglas St.
City of Victoria
V8X 1X4

JOHN/JANE DOE OFFICER
c/o The Minister of Public Safety and Solicitor General of British Columbia
BRITISH COLUMBIA
PO BOX 9282 STN PROV GOVT
City of Victoria
BC V8W 9J7

ELIZABETH THE SECOND, by the Grace of God, of the United Kingdom, Canada and
Her other Realms and Territories, Queen, Head of the Commonwealth, Defender of the
Faith.

**TO the defendants: COLIN MANGHAM, DRUG FREE AMERICA FOUNDATION,
INC., CHUCK DOUCETTE, THE MINISTER OF PUBLIC SAFETY AND
SOLICITOR GENERAL OF BRITISH COLUMBIA, HER MAJESTY THE
QUEEN IN RIGHT OF THE PROVINCE OF BRITISH COLUMBIA and
JOHN/JANE DOE OFFICER**

TAKE NOTICE that this action has been commenced against you by the Plaintiff for the
claims set out in this writ.

IF YOU INTEND TO DEFEND this action, or if you have a set off or counterclaim that
you wish to have taken into account at the trial, YOU MUST

(a) GIVE NOTICE of your intention by filing a form entitled "Appearance" in the
above registry of this court, at the address shown below, within the Time for
Appearance provided for below and YOU MUST ALSO DELIVER a copy of the
Appearance to the plaintiff's address for delivery, which is set out in this writ, and

(b) if a statement of claim is provided with this writ of summons or is later served
on or delivered to you, FILE a Statement of Defence in the above registry of this

court within the Time for Defence provided for below and DELIVER a copy of the Statement of Defence to the plaintiff's address for delivery.

YOU OR YOUR SOLICITOR may file the Appearance and the Statement of Defence. You may obtain a form of Appearance at the registry.

JUDGMENT MAY BE TAKEN AGAINST YOU IF

(a) YOU FAIL to file the Appearance within the Time for Appearance provided for below, or

(b) YOU FAIL to file the Statement of Defence within the Time for Defence provided for below.

TIME FOR APPEARANCE

If this writ is served on a person in British Columbia, the time for appearance by that person is 7 days from the service (not including the day of service).

If this writ is served on a person outside British Columbia, the time for appearance by that person after service, is 21 days in the case of a person residing anywhere within Canada, 28 days in the case of a person residing in the United States of America, and 42 days in the case of a person residing elsewhere.

[or, if the time for appearance has been set by order of the court, within that time.]

TIME FOR DEFENCE

A Statement of Defence must be filed and delivered to the plaintiff within 14 days after the later of

(a) the time that the Statement of Claim is served on you (whether with this writ of summons or otherwise) or is delivered to you in accordance with the Rules of Court, and

(b) the end of the Time for Appearance provided for above.

[or, if the time for defence has been set by order of the court, within that time.]

(1) The address of the registry is:

800 Smithe Street
Vancouver, British Columbia
V6Z 2E1

(2) The Plaintiff's ADDRESS FOR DELIVERY is:

678 East Hastings
Vancouver, British Columbia
V6A 1R1

Fax number for delivery: (604) 255-1552

(3) The name and office address of the Plaintiff's solicitor is:

H. Nina Purewal
c/o Pivot Legal LLP
Barristers and Solicitors
678 East Hastings
Vancouver, British Columbia
V6A 1R1

The Plaintiff's claim is:

The Plaintiff operates the Insite supervised injection site, which is located at 139 East Hastings Street in the City of Vancouver ("Insite"). The Defendant, The Minister of Public Safety and Solicitor General of British Columbia, who is responsible for the supervision, training, direction and control of the Royal Canadian Mounted Police ("RCMP") entered into a contract with Defendant Colin Mangham to write an article about Insite.

On or about May 2, 2007, Defendant Mangham released of "A Critique of Canada's Insite Injection Site and its Parent Philosophy: Implications and Recommendations for Policy Planning" (the "Insite Article") to the general public. On or about May 25, 2007 the Institute and the Defendant Drug Free America published the Insite Article on the Website at <http://www.globaldrugpolicy.org/1/2/2.php> (the "Website"). By virtue of being published on the Website, the Insite Article is available to anyone around the world. The Insite Article has since been republished on a regular basis, the most recent republication was in the summer of 2009.

The Defendant Drug Free America and the Defendant Mangham wrote and published the Insite Article and the Plaintiff claims damages for defamation, as the Plaintiff has been seriously injured in its character, credit and reputation.

The Plaintiff also claims damages when the Defendant Doucette slandered the reputation of Insite and the Plaintiff by actively promoting with the Insite Article, when he knew, or ought to have known, that it was defamatory and inaccurate.

The Plaintiff suffered damages when the Defendant RCMP, Defendant Doucette and Defendant Jane/John Doe Officer acted negligently in commissioning the Insite Article and continuing to allow the Insite Article to be associated with the RCMP.

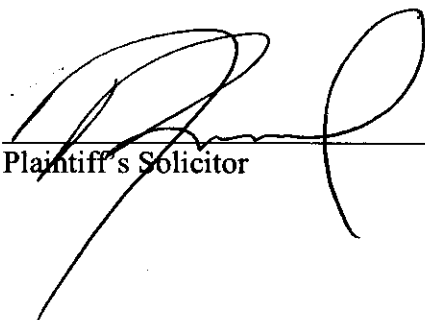
The Plaintiff claims damages against the Defendant RCMP, Defendant Doucette and Defendant Jane/John Doe Officer for misfeasance in public office by commissioning the Insite Article and continuing to allow the Insite Article to be associated with the RCMP

Plaintiff claims damages when, between 2005 and 2007, the RCMP, the Defendant Doucette, Defendant Jane/John Doe Officer and the Defendant Mangham met, planned, and conspired among themselves to advance their own aims and interests by, among other things, doing the acts in relation to or in connection with the Insite Article being published.

Further particulars of the Plaintiff's damages will be set out in the Statement of Claim.

Place of trial: Vancouver, British Columbia

Dated this 28th day of August, 2009.


Plaintiff's Solicitor

This Writ of Summons was filed by H. Nina Purewal of Pivot Legal LLP, whose place of business and address for service and delivery is at 678 East Hastings Street, Vancouver, B.C., V6A 1R1, Phone: (604) 255-9700, ext. 146, Fax: (604) 255-1552.