

HERE'S PROOF THAT MERYL DOREY LIED UNDER OATH.

The background to this story is that the New South Wales Office of Liquor Gaming and Racing, a government department, wrote to Meryl Dorey, in her role of Public Officer of the so-called "Australian Vaccination Network" on 14 October 2011. The letter notified her and the AVN that the Minister had cancelled the AVN's Charitable Fundraising Authority, and is available at <http://www.scribd.com/doc/51133133/OLGR-Letter-to-AVN-Advising-of-Revocation-14-10-10>.

Ms Dorey then scanned it and published it on Scribd, where some eagle-eyed critics of the AVN found it and downloaded it. It was then republished on my Scribd account.

Note that the author of the document, the NSW Government did not assert copyright ownership at any time.

On Saturday 30 April 2011, Meryl Dorey sent an email to Scribd, claiming under oath that she was the copyright owner and demanded that it be taken down. Scribd, as required by the US Digital Millennium Copyright Act, removed it from their servers, and contacted me for a response.

Of course, I objected to the takedown, and the following pages show all the correspondence between me and Scribd that followed. I asked for a copy of Meryl Dorey's complaint, and that is on the last page.

Note that in her complaint Meryl Dorey says:

"I am the exclusive rights holder for material held at <http://www.avn.org.au> and <http://www.facebook.com/pages/Australian-Vaccination-Network/55142201924?v=wall&ref=mfj>;

"These exclusive rights are being violated by material available upon your site at the following URL(s):

"[<http://www.scribd.com/doc/51133133/OLGR-Letter-to-AVN-Advising-of-Revocation-14-10-10>];" and:

"Under penalty of perjury in a United States court of law, I state that the information contained in this notification is accurate, and that I am authorized to act on the behalf of the exclusive rights holder for the material in question;"

Scribd have rejected Dorey's complaint, and have restored the letter to my Scribd account.

Case closed: Meryl Dorey has lied under oath. The Penalty in New South Wales is five years imprisonment. Watch this space.



Welcome back, ken_mcleod

Request #112431

Re: Your document has been removed

ken_mcleod
May-01 03:18 pm

Scribd, Inc.
Attn: Jason Bentley, Copyright Agent
539 Bryant St, Suite 200
San Francisco, CA 94107

Dear Mr. Bentley:

This letter is a formal response to a claim of copyright infringement against one or more of the documents that I've uploaded and published on Scribd.com. I believe the claims of copyright infringement are wrong and vexatious and should be rejected because:

1. The material in question is not copyrighted. The letter which I posted was from an Australian government department, (The New South Wales Office of Liquor Gaming and Racing) reporting its findings of their investigation of a fraudulent "charity", the so-called "Australian Vaccination Network" and its Public Officer, Ms Meryl Dorey, who I believe to be your complainant. The letter is a public document, and was first posted by Meryl Dorey on her Scribd account. Indeed, the letter and all the other material has been lodged in the New South Wales Supreme Court as part of the Discovery process, see the attached Court Lising. It is therefore in the public domain and may be reproduced by anyone.
2. The complainant has provided no copyright registration information or other tangible evidence that the material in question is in fact copyrighted, and I have a good faith belief that it is not. The allegation of copyright violation is therefore in dispute, and at present unsupported.
3. The complainant does not hold the copyright to the material in question, is not the designated representative of the copyright holder, and therefore lacks standing to assert that my use of the material is a violation of any of the owner's rights. If copyright ownership was to be asserted by anyone, it would have been asserted by the author, and it was not.
4. My use of the material is legally protected because it falls within the "fair use" provision of the copyright regulations, as defined in 17 USC 107. The "fair use" provisions allow for reproduction for the purposes of reporting, research, satire, and so on, and my post conformed to the Act. If the complainant disagrees that this is fair use, they must work directly with me, through legally viable channels, to resolve the dispute. Ms Dorey and the New South Wales Government have never contacted me to express any concerns they may have. Scribd and its employees under no obligation to settle this dispute, or to take any action to restrict my speech at the behest of this complainant.
5. The complaint does not follow the prescribed form for notification of an alleged copyright violation as set forth in the Digital Millennium Copyright Act, 17 USC 512(c)(3). Specifically, the complainant has failed to:
 - a.. Provide a complaint in written form. [17 USC 512(c)(3)(A)]
 - b.. Include a physical or electronic signature of the complainant. [17 USC 512(c)(3)(A)(i)]
 - c.. Identify the specific copyrighted work claimed to be infringed, or, if multiple copyrighted works are covered by a single complaint, provide a representative list of such works. [17 USC 512(c)(3)(A)(ii)]
 - d.. Provide the URLs for the specific files on my web site that are alleged to be infringing. [17 USC 512(c)(3)(A)(iii)]
 - e.. Provide sufficient information to identify the complainant, including full name, mailing address, telephone number, and email address. [17 USC 512(c)(3)(A)(iv)]
 - f.. Include a written statement that the complainant has a good faith belief that use of the disputed material is not authorized by the copyright owner, its agent, or the law. [17 USC 512(c)(3)(A)(v)]
 - g.. Include a written statement that the information in the notification is accurate, and under penalty of perjury, that the complainant is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed. [17 USC 512(c)(3)(A)(vi)]
6. The complainant Meryl Dorey or her legal representatives, have never contacted me with their concerns, although they have my postal and email address.
7. The complaint is vexatious in that Ms Dorey is embarrassed to have been exposed in breaches of Australian legislation by the letter, and is attempting to prevent evidence from being published. She is attempting to prevent many documents from being published, and I ask that you regard her as a vexatious complainant and ignore her.

This communication to you is a DMCA counter notification letter as defined in 17 USC 512(g)(3):

I declare, under penalty of perjury, that I have a good faith belief that the complaint of copyright violation is based on mistaken information, misidentification of the material in question, or deliberate misreading of the law.

I ask that Scribd, upon receipt of this counter-notification, restore the material in dispute, unless the complainant files suit against me within ten (10) days, pursuant to 17 USC 512(g)(2)(B).

My name, address, and telephone number are:

FULL NAME: Kenneth Vincent McLeod
MAILING ADDRESS PO Box 51, Moruya, 2537, New South Wales, Australia.
TELEPHONE NUMBER 61 2 4473 6363

I hereby consent to the jurisdiction of the Federal District Court for the San Francisco, California judicial district).

I agree to accept service of process from the complainant.

Best regards,

(the above is the genuine signature of me, Kenneth Vincent McLeod)

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

From: Scribd Copyright Notice

This request
deemed s
May-18



You can reopen
adding a comme

To: turlinja@internode.on.net
 Sent: Saturday, April 30, 2011 4:09 AM
 Subject: Your document has been removed

 Hello, ken_mcleod --

We have removed your document, "OLGR Letter to AVN Advising of Revocation 14-10-10" (id: 51133133) in response to a third-party notification or other indicia that this document was uploaded to Scribd.com without the authorization of the copyright owner. If you believe the removal of this document is the result of a mistake or misidentification, please visit our Scribd Support Desk to access the instructions for providing a counter-notification.

For more information, read about our Copyright Management System or contact us through copyright@scribd.com.

Please note that under Section 512(f) of the Copyright Act, any person who knowingly materially misrepresents that content was removed or disabled by mistake or misidentification may be subject to liability. Please also be advised that we enforce our policy that provides for the termination of users who are identified as repeat infringers.

Thanks for your cooperation.

-Scribd Customer Care

P.S. You can always fine-tune which notifications you receive or opt-out completely.

 Scribd Inc., 539 Bryant St., Suite 200, San Francisco, CA 94107, USA

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

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 To: turlinja@internode.on.net
 Sent: Saturday, April 30, 2011 4:09 AM
 Subject: Your document has been removed

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 Scribd Inc., 539 Bryant St., Suite 200, San Francisco, CA 94107, USA

 [Signature copy.jpg \(quick view\)](#)

 [AVNcourtListing13April.JPG \(quick view\)](#)

Comments



Jason
Support Desk

Mr McLeod:

We are in receipt of your counter-notification. We appreciate your patience as we notify the complainant and await their response.

Best,

Jason Bentley
Scribd Support

May-04 2011 02:54 pm



ken_mcleod

Please note that 10 days have passed since the copyright violation complaint was lodged by Meryl Dorey. No complainant has filed suit against me pursuant to 17 USC 512(g)(2)(B). I have not received any communication at all from anyone purporting to be the complainant or their legal representatives, yet they have my postal address, email address, and Facebook address, and phone number.

The complaint was clearly dishonest, false, medacious, and vexatious. I request restoration of the document in question.

May-09 2011 02:45 pm



Jason
Support Desk

Mr. McLeod:

Your DMCA counter-notification was submitted on May 1, 2011. Ms. Dorey has up to 10 business days to respond to your counter-notification. As such, the earliest I can revisit your claim is Monday, May 16, 2011.

Best regards,

Jason Bentley
Scribd Support

May-10 2011 11:20 am



ken_mcleod

thanks Jason

sorry for jumping in too soon, I missed the "business" part of the "10 business days."

cheers

Ken

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

From: Jason

To: ken_mcleod

Sent: Wednesday, May 11, 2011 4:20 AM

Subject: [Scribd Support] Re: Re: Your document has been removed (ticket #112431)

May-10 2011 02:18 pm



Jason
Support Desk

Hi, Ken:

As we've received no communication from Ms. Dorey, the items in your account have been restored.

Best,

Jason

May-16 2011 04:18 pm



ken_mcleod

thanks Jason

may I have a copy of the original complaint from MS Dorey please,

regards

Ken

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

From: Jason

To: ken_mcleod

Sent: Tuesday, May 17, 2011 9:18 AM

Subject: [Scribd Support] Re: Re: Your document has been removed (ticket #112431)

May-16 2011 04:32 pm



Jason
Support Desk

Hi, Ken:

Here is a copy of the original complaint, in text below, and as an attached screenshot.

Best,

Jason

*** BEGIN DMCA NOTIFICATION ***

Pursuant to 17 USC 512(c)(3)(A), this communication serves as a statement that:

I am the exclusive rights holder for material held at <http://www.avn.org.au> and <http://www.facebook.com/pages/Australian-Vaccination-Network/55142201924?v=wall&ref=mf>; These exclusive rights are being violated by material available upon your site at the following URL(s): [<http://www.scribd.com/doc/51133133/OLGR-Letter-to-AVN-Advising-of-Revocation-14-10-10>]; I have a good faith belief that the use of this material in such a fashion is not authorized by the copyright holder, the copyright holder's agent, or the law; Under penalty of perjury in a United States court of law, I state that the information contained in this notification is accurate, and that I am authorized to act on the behalf of the exclusive rights holder for the material in question; I may be contacted by the following methods (include all): Australian Vaccination Network, PO Box 177, BANGALOW NSW 2479, AUSTRALIA; Phone - 612 6687 1699 - FAX 612 6678 0894 - Mobile 61414 872 032 - email meryl@avn.org.au

I hereby request that you remove or disable access to this material as it appears on your service in as expedient a fashion as possible. Thank you.

Regards,
Meryl Wynn Dorey

Meryl Dorey,
Spokesperson
The Australian Vaccination Network, Inc.
Investigate before you vaccinate
Editor,
Living Wisdom Magazine
Family, Health, Environment
PO Box 177
BANGALOW NSW 2479
AUSTRALIA
<http://www.avn.org.au>
<http://www.living-wisdom.com>
Phone: 02 6687 1699
FAX 02 6687 2032
skype: ivmmag

*** END DMCA NOTIFICATION ***

 [dorey.jpg \(quick view\)](#)

May-18 2011 04:07 pm



ken_mcleod

Add a comment to this request