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FARGO & BENSON LLP

APR 8 2002

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
CIVIL DIVISION

Civil Case No. 02-WM-0117 (CBS)

THE CONTINUING EPISCOPAL CHURCH;
THE HOLY EASTERN ORTHODOX CATHOLIC AND
APOSTOLIC CHURCH IN NORTH AMERICA, INC.

Plaintiffs

v.

MONTGOMERY GRIFFITH AKA MONTGOMERY GRIFFITH-MAIR;
DIRECLYNX, INC; ANTHONY P. BEGONJA

Defendants

SUPPLEMENTAL DECLARATION OF VICTOR PRENTICE

NOW COMES Victor Prentice who states as follows:

1. Defendant Anthony Begonja has been harassing me personally and attacking our Church ever since I personally requested he remove his listing of our Church from his internet "directory".

2. Defendant Begonja has published false information about me personally and our Church as a means of harassment including but not limited to the following:

2.a. Defendant Begonja has altered our Church name, a registered service mark, to read "The unHoly Esoteric unOrthodox and unCatholic Apostate-olic "Church" of North Arkansas, Inc., Mountain View, Arkansas" as of this writing at http://www.ind-movement.org/unholy_church_2_links.html.

2.b. Defendant Begonja accuses me of “TRYING TO UNLAWFULLY STEAL CONTROL of a long dormant church corporation” as of this writing at http://www.ind-movement.org/unholy_harm.html.

2.c. Defendant Begonja makes six separate claims of harassment by me, which I deny completely, on the same web page as 2.b. above.

2.d. Defendant Begonja claims I “Criminally forged a federal court subpoena and criminally misled a law-enforcement agency to deliver said subpoena”, which I deny completely, on the same web page as 2.b. and 2.c. above.

2.e. The web page relation to 2.b., 2.c., and 2.d., above, is titled “Ind-Movement.Org, Bad Fruits, Rogues & Churches Best Avoided: Harm Caused by the Unholy Persons” and subtitled “The Specific Acts of Damage CJ3 and Prentice (and “Fr. Thomas) Have Done and Continue to do the Autocephalous Movement”. Defendant Begonja follows this with “In addition to these joint activities, CJ3 has done the following damage as well:”. All the above claims as they relate to me are denied.

2.f. Defendant Begonja publishes our Church name, a service mark, on a page that includes in the heading “Best Avoided: Names of the Unholy “Churches””.

2.g. Since I am not a public figure, I feel that Defendant Begonja publishing any information about me after he was asked to remove us from his site is an invasion of privacy. On Defendant Begonja’s short bio of the Plaintiffs page, Defendant Begonja lists false information in the first eight lines about me, from my age, when I was consecrated, who consecrated me, that I attempted to take over this Church, that I was “unconditionally re-consecrated”, that I attacked other autocephalous clergy and churches, and states this includes the canonical Orthodox Church of America. In fact, an

attorney letter to the Metropolitan of the Orthodox Church in America was sent on our behalf, and we subsequently received an apology letter from the Metropolitan through his attorney. All of the other false information stated above is the guesswork of Defendant Begonja who would rather publish false information than state the truth that he does not know. As for “attacking” other churches, I deny this also. We did take legal steps to end the false claims by others listed on Defendant Begonja’s “directory” who claimed to be us. On the same page as 2.b., 2.c., and 2.d., above, Defendant Begonja claims I made a violent and defamatory attack upon one Marina Mary Robb of Greece which I also deny.

2.h. Defendant Begonja has a page of links on the “Bad Fruits” page. This includes links to our Church name, a service mark. Published on that page are links to our Church name altered, as stated above, and a false information page that links to the web site of Defendant Montgomery Griffith-Mair containing copyrighted photographs with Defendant Griffith-Mair’s own bogus copyright notices affixed, and that links to the web site of Defendant Griffith-Mair that uses our Church name, a service mark, to attack me personally as well as to attack our Church. These pages are included in the Amended Complaint as, respectively, Exhibits C.4., C.7., and C.10.

3. Defendant Montgomery Griffith-Mair has been harassing me personally and attacking our Church ever since I personally requested he remove his listing of our Church from his internet “directory”.

4. Defendant Griffith-Mair has published false information about me personally and our Church as a means of harassment including but not limited to the following, as of this writing on his website <http://archbishops.org/prentice.htm>:

4.a. Defendant Griffith-Mair claims and admits that he made numerous trips from Mountain View, Arkansas to our property about 15 miles away with about seven miles of gravel road in order to trespass, window peep, and to stalk.

4.b. Defendant Griffith-Mair has altered one of our photographs and has "Self-Photo" as well as Defendant Griffith-Mair's copyright claim on said.

4.c. Defendant Griffith-Mair posted a photograph of the license plate of our Church vehicle.

4.d. Defendant Griffith-Mair stated on his website that while trespassing at night that Defendant Griffith-Mair took an offensive rather than a defensive posture to protect himself.

4.e. Defendant Griffith-Mair states that he left his vehicle running and the door open since there was only one way in and out of the property.

4.f. Defendant Griffith-Mair acknowledges he was there after dark and that he watched me for hours.

4.g. Defendant Griffith-Mair invades my privacy, as well as that of our Church, by publishing the legal description of our property and taxes. Defendant Griffith-Mair publishes that I was born in Ohio, that I possess an AK-47 rifle, which I deny, and other guns such as a shotgun.

4.h. Defendant Griffith-Mair states that no one should donate to our Church. This is while Defendant Griffith-Mair uses our Church name, a registered service mark, on the same web page which is supposed to be his "church" web site. We view this as dilution and disparagement of our service mark and unfair competition.

4.i. Defendant Griffith-Mair publishes another photograph of me at <http://www.archbishops.org/begonja.htm>, and said photograph shows another copyright notice claim by Defendant Griffith-Mair and contrary to FRCP 506c – Fraudulent Copyright Notice.

4.j. Defendant Griffith-Mair made contact with a priest of this Church to claim that we were a fraud, were not who we claim to be, and more. As a direct result of that contact, the priest who was upset due to a death in his family subsequently requested to be removed from our clergy rolls. Defendant Griffith-Mair published his false and disparaging statements both publicly and privately on mailing lists and consequently attacked our service mark.

5. The reasons we asked to be removed from the websites of Defendant Begonja and Defendant Griffith-Mair are:

5.a. Defendant Begonja's web "directory" at domain ind-movement.org had links to a prostitution page, had such wording as "gay friendly" in the meta tags, and because we are not part of the independent movement as are the majority of those whom Defendant Begonja lists.

5.b. Defendant Griffith-Mair was originally publishing numerous pages attacking a neighbor woman in Bay Saint Louis, MS. This included a photograph of me that I asked Defendant Griffith-Mair to remove from his site. Instead of removing the photograph as requested, Defendant Griffith-Mair added rifle scope cross hair type lines over my face as shown in Exhibit J. Defendant Griffith-Mair published that he was accused of pointing a gun at that neighbor. Defendant Griffith-Mair published links to another domain he owned named scalawagz.org, also mirrored at his domains

fathermonty.org and padremonty.org. Those domains published partially clad naked boys using paddles to spank each other. In those domains Defendant Griffith-Mair also attacked a lawyer, police officers, and others all by name.

5.c. We could not allow ourselves to be associated with Defendant Begonja and Defendant Griffith-Mair who act in such ways and who link to publish such pages.

6. Defendant Griffith-Mair on his "prentice.html" page states in referring to the Plaintiff's representatives in this case that we personally "should be buried together in one holozic grave" and with our "mouths stitched together".

7. Defendant Begonja and Defendant Griffith-Mair, working together, use our copyrighted property and service mark property to harass, defame, intimidate, and threaten the corporate officers of the Plaintiff corporations.

8. Because this is an infringement case, and not an harassment case, I assert the fact that the harassment by the Defendants against this Plaintiff are by infringing our service mark and copyrights and by other activities as stated above.

Dated this 19th day of April, 2002.



Victor Prentice

EXHIBIT J.

