

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

From: [Wade Singleton](#)

To: [Peter Holmes a Court](#)

Cc: Anne.Flahvin@BakerNet.com ; andrew.christopher@BakerNet.com

Sent: Monday, April 23, 2007 6:59 AM

Subject: Re: Forum.

On 17/04/2007, at 8:51 PM, Peter Holmes a Court wrote:

Wade, the board agreed on monday to take steps to distance the club from material that is being posted on internet forums that is defamatory and is perceived to damage the Club's image. Included in this resolve will be to distance the club from individuals who continue to post material that is defamatory of other club members.

Who decides what is defamatory? Which Members have been defamed? What material has damaged the Club's image? I suppose employing a flag burner or being sponsored by a company that sells snake oil does NOT harm the Club's image in your selective opinion Peter?

From a legal perspective, and as a courtesy only, I am advising all forum moderators to take their own legal advice on their personal liability for statements posted on their sites that individuals may find defamatory. The club will make available the advice we have received on the liability issues arising from internet postings, again only as a courtesy and we will assume other legal advice will be taken and the club's advice will not be used to rely upon.

Individuals would need to seek legal counsel regarding dealing with the author of the post that they find defamatory.

From a personal perspective, I can not accept the harassment and slander of club members on sites that are frequently associated with the Club. In fact your site goes out of its way to look and feel like an official Rabbitohs site, using the images of the Club's history and chose the name of the club as its URL.

We have already been asked to remove Souths and NRL IP from the site and this request was complied with in less than 48 hours. No further correspondence was entered into until this tirade. But I have to ask, which Club Members have been slandered or harassed? In what way does rabbitohs.com "go out of its way to look and feel like an official Rabbitohs site"?

My how times change Peter. Not only do I distinctly remember you waxing lyrical about how good the site looked in your very own home in front of several witnesses during a meeting we had back in December 2005, but what about this quote by you:

"I believe internet forums substantially increase the accuracy of the available information on any subject covered by them, and (not sucking up, just observing) this site is an great example of an extremely active "community of interest". (best book I am told is "we the media" on this subject, I quote bits from it, but haven't got round to reading it.) I am a big fan of this process and think that big or old or traditional media has many reasons to question their business models. That doesn't mean that some of the information isn't utter rubbish and that the "wisdom of crowds" (another great book, not yet finished) isn't so wise if the process is not balanced by all the facts."

--Peter Holmes a Court (The Hutch, 29/06/2006)

<<http://www.rabbitohs.com/hutch/showthread.php?t=15442>>

FYI, the rabbitohs.com domain was registered in January 1999 with a view to forming a fan-based website dedicated to the Club. It has always been a fan site and has never declared otherwise. Since the Hutch forum was formed it has been disclaimed on its opening page as 'the unofficial Souths site' and more recently as 'the independent Souths site'. It should also be noted that the rabbitohs.com URL was registered years after the Club had registered souths.com.au as its own. In fact, rabbitohs.com website was used by the Club during the reinstatement fightback as an information conduit and by yourself prior to the EGM to enhance your prospects of winning the vote to own 75% of the management rights of the SSDRLFC.

It is worth noting that the ownership of the rabbitohs.com domain was transferred in April 2006 to a third party offshore. Ironically to protect it from the machinations of those who would threaten the integrity of the site.

I cannot accept that your campaign should continue personal attacks and slander. I do not see any reasons beyond the personal gratification of you and your associates for the site to continue to attack people as it does. I cannot accept that it provides a safe haven for people who write and distribute threatening and bullying emails to a very broad audience, eg wolffy.

Whether you accept it or not the site and the owners of the site, and the administrators of the site are not responsible for slander, defamation or anything else as perceived by you. They are also not responsible for the opinions expressed by those who use the site. We will and do act when we receive notification via our 'Report Post' function on anything that we feel is inappropriate for our forum.

As I have said before, there is simply no place in our club for people who promote intimidation, threats, and online bullying. Regardless of past history, any member who continues these practices will be refunded any membership dues and distanced by SSFC and we will request Member Co also acts to remove offending members. .
If you wish to contact me to discuss how your site could respond to our concerns, please feel free to contact me by email or phone. However suggestions of blackmail, or that "the price has gone up" to buy you out, will indicate that you wish to conduct the rest of our correspondence through our lawyers.

This email you have sent Peter is filled with implied threat amongst inaccurate and opinionated assessment. Member Co has to go through due process to suspend Members. It is certain that as opposed to the Star Chamber tactics of the past this sort of thing will receive very wide publicity and be exposed for what it is. Nobody has blackmailed you Peter, you have that opinion, but I perceive that opinion as rather childish and erroneous and I would refute it completely. Need I remind you the idea of buying the site only gained momentum following the comments made by you and repeated below:

"I would like to explore further the conversation aroundn [sic] what will happen to rabbitohs.com and the forum as you have customised it. it is a cracker and I am not sure we should to go to the time to copy it! I'd love to discuss options on the spectrum from you sharing your thoughts on the best structure for the official forum to SSFC buying and converting the site to a members only forum, or points in between."

--Peter Holmes a Court (via email, 07/11/2006)

Finally, let's examine the recent timeline of events.

- * No contact for several months.
- * Sudden contact to inform me about Bunnyman being sued by Nolene Piggins.
- * Implied threats that I am about to be sued.
- * Bunnyman advised by you that I should apologise and be contrite and donate the domain to the Club.
- * Phone conversation with you where you suggest you're just trying to 'help'. That help involves scare tactics, threats and more suggestions that the domain be handed over to the Club. Coercion, cajoling and playing to our sense of dedication to the Club.
- * The last two emails from you have been threatening in manner and content and continued coercion. The 'help' has changed indeed.

Surely you must be aware that any legal action against a well known and famous fan site would receive great publicity in the press and be bad publicity for the Club. I really think you should ask yourself whether your current strategy is likely to work. Do you really think threats, intimidation and bullying tactics (the very things

you profess to be against, oh the irony) are going to be effective?

You've made this much harder than it needed to be Peter and your recent behaviour has not only appalled me but open my eyes to your true colours, which in turn has made me start to seriously question whether you are fit to own the domain at all.

Last but not least, I have found your recent contact with me extremely harassing and bullying in nature. I have sought advice and I must now insist that you cease using this coercive and threatening manner.

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Regards,
Wade Singleton

<<http://www.rabbitohs.com/>>

Rabbitoh Warren: The Unofficial South Sydney Website