

I, **NEIL EDWARD WELLS**, of Auckland, barrister sole and territorial authority manager, swear:

Introduction/scope of evidence

1. I am employed by the Waitakere City Council as Manager: Animal Welfare. I am also a barrister sole. As well as being the second plaintiff in this matter I am also the founder and trustee of the first plaintiff which, following the terminology used in the statement of claim, I refer to in this affidavit as "AWINZ 2000". I am authorised to speak on behalf of AWINZ 2000 in these proceedings.
2. The purpose of this affidavit is to:
 - (a) Set out some background to the statement of claim, to enable the Court to properly understand the context of these proceedings.
 - (b) Explain to the Court the impact that Mrs Haden has had (and continues to have) on the legitimate business activities of AWINZ 2000, both as foundation for:
 - (i) the injunctive relief sought under the first cause of action (passing off); as well as
 - (ii) the damages sought under the first and second causes of action (passing off and misleading and deceptive conduct in trade).
 - (c) Explain to the Court the impact that the statements pleaded in paragraphs 20 to 35 of the statement of claim have had upon me personally, in support of the damages and injunctive relief sought with respect to the third cause of action (defamation).
3. I also want to take this opportunity to formally advise the Court of some of the ongoing issues that I and the other plaintiffs have encountered with respect to Mrs Haden. In an effort to try and have this matter heard quickly and efficiently, we have steered away from filing an amended claim during the course of the last 17 months addressing some of these issues. However, as this affidavit will demonstrate, Mrs Haden has remained extremely active during that period, increasing the intensity of her efforts to undermine the activities of AWINZ 2000, and to attack and damage my reputation personally.
4. I have accordingly included at the end of my affidavit a section setting out some of the key actions that are of concern. For the purposes of these proceedings that section is intended to:
 - (a) highlight the need for the injunctive relief sought in this case; and

- (b) illustrate the malicious motives of Mrs Haden, in further support of the assertion in paragraph 38 of the statement of claim that this is an appropriate case for the imposition of punitive damages.
- 5. I have been advised, and understand, that the hearing of this matter is as to quantum only, and that the matters pleaded in the statement of claim are therefore assumed by the Court to be true. As such, I have endeavoured in this affidavit to:
 - (a) not repeat any of the factual material already pleaded;
 - (b) not respond in any full or substantive manner to the numerous allegations made against me by Mrs Haden. Each and every one of those allegations is denied by me and can be made subject to a full response. However, given that this is a hearing as to quantum only, it does not appear to be the proper forum to do so;
 - (c) keep the extent of new factual material not already pleaded to a bare minimum; and
 - (d) avoid any material likely to be contested by Mrs Haden and hence likely to draw out the length of the hearing.
- 6. In doing so, I am conscious of the fact that there is a significant amount of material available to me that I am not placing before the Court. If these proceedings prove ineffective in bringing Mrs Haden's activities against me and AWINZ 2000 to an end, it is likely that this material may form the basis of further litigation against Mrs Haden in the future. Obviously, both I and the other plaintiffs sincerely hope that this proves to be unnecessary.
- 7. As a final point, I note that there are several steps that have been taken by Mrs Haden this year which has altered the position of the defendants somewhat. In particular, she has:
 - (a) Formed a company "Animal Welfare Institute of New Zealand Limited", **[Appendix A]** to which she sold the domain name "www.awinz.co.nz", in an apparent effort to frustrate aspects of the statement of claim.
 - (b) Changed the name of the third defendant from "Animal Welfare Institute of New Zealand Incorporated" to "Animal Owners Supporters Trust" again in an apparent effort to frustrate aspects of the statement of claim; **[Appendix B]** and
 - (c) Obtained a trademark of the acronym "AWINZ", for reasons which are not clear, but again which would appear to be aimed at impairing the legitimate business activities of AWINZ 2000.
- 8. Again, while the plaintiffs considered filing amended pleadings to take account of Mrs Haden's actions in these regards, it was felt that the

presently worded statement of claim is still able to achieve the key aim of these proceedings which is to:

- (a) make Mrs Haden personally responsible for her actions; and
- (b) prevent her from continuing her malicious campaign against AWINZ 2000 and against me personally.

Mrs Haden's actions have however had the practical effect of rendering ongoing action against the third defendant unnecessary, and orders against the third defendant are no longer sought.

- 9. Once more, if these proceedings prove ineffective in curtailing Mrs Haden's ongoing campaign, it may be that further litigation will be required in the future, naming Mrs Haden's company, Animal Welfare Institute of New Zealand Ltd, as a defendant, and seeking to review the legality and appropriateness of the trademark she holds. Again, it is hoped that such litigation proves unnecessary.

Background to proceedings

Animal Welfare Career

- 10. I was formerly Associate Head of School of Natural Sciences at Unitec New Zealand and in that role led and lectured courses in animal welfare investigations, particularly animal law.
- 11. I have a long history of involvement in animal welfare over a period spanning 30 years. [CV attached as **Appendix C**]
- 12. I have been involved in governmental organisations and non-governmental organisations associated with animal welfare both nationally and internationally.
- 13. In particular I was a member of the Animal Ethics Advisory Committee and member and deputy chairman of the Animal Welfare Advisory Committee (AWAC) from 1984 to 1999.
- 14. As a member of AWAC and as a legal consultant to the Ministry of Agriculture and Forestry I was heavily involved in preparing Cabinet papers for a proposed Animal Welfare Bill. In particular I wrote cabinet papers for the Bill leading up to 1997.
- 15. In the foreword of a public discussion paper released in 1990 by the Ministry of Agriculture and Forestry *A Review of the Animals Protection Act 1960*, the Minister of Agriculture, Hon John Falloon, wrote:

"This review is timely and in compiling it I am appreciative of the advice of the Animal Welfare Advisory Committee and the particular contribution of Neil Wells."

16. I have been a member of the Animal Welfare Behaviour and Welfare Consultative Committee (ABWCC) since its inception. ABWCC includes representatives of AgResearch, Department of Conservation, Federated Farmers, Fund for Research and Technology, Waikato University, Meat Board, Ministry of Agriculture and Forestry, Ministry of Foreign Affairs and Trade, Ministry of Research and Technology, NZ Veterinary Association, Poultry Industry Association, Royal New Zealand SPCA, Royal Society of New Zealand, The Animal Welfare Institute of New Zealand, Unitec New Zealand, Waikato University, and Wool Board.
17. In 1997 ABWCC contacted every Member of Parliament lobbying for early consideration of an Animal Welfare Bill. Pete Hodgson MP contacted the Secretary of the ABWCC and offered to introduce a Private Members Bill in his name if someone could write it.
18. I was contracted to ABWCC to write the first Animal Welfare Bill in 1997 and it was balloted for a first reading in 1997, whereupon it was referred to the Primary Production Select Committee for consideration.
19. In 1998 the Minister of Agriculture introduced a second Animal Welfare Bill as a Government measure and that too was referred to the Primary Production Select Committee.
20. The two Bills were heard together, public submissions were called for and hearings conducted over 1998 and 1999.
21. During the Consideration stage of the Bills I was contracted by Parliament to act as an Independent Specialist Advisor and in that capacity I advised the Select Committee along with officials of the Ministry of Agriculture and Forestry.
22. Elements of both Bills were merged and formed the Bill that was referred to Parliament and the Select Committee reported back to Parliament in May 1999. The Animal Welfare Act 1999 ("the Act") was passed later that year, and commenced on 1 January 2000. Comments on my contribution are recorded in the Committee report which is attached as **Appendix D**.
23. My contribution to the Bill was acknowledged in speeches in the House from both the Government and the Opposition speakers in all three readings of the Bill.

Formation of the Animal Welfare Institute of New Zealand

24. In 1995 I acted as the intermediary between the Ministry of Agriculture and Forestry and the Waitakere City Council and set up a pilot programme whereby animal control officers of Waitakere City were warranted as Inspectors under the Animals Protection Act 1960. AWINZ 2000 eventually evolved from that pilot programme.

25. The objective of the pilot programme was to test the synergies between animal control and animal welfare. Prior to this only people from SPCAs had been warranted outside Government Departments.
26. The pilot programme was originally set up for 6 months in the expectation that an Animal Welfare Bill would be introduced in 1995, and the programme could then be formalised under that new law. With each delay to the introduction of the Animal Welfare Bill the Waitakere Pilot Programme was rolled over. The MAF Compliance Team audited the performance of the pilot programme on an annual basis.
27. The pilot programme ceased when the Animals Protection Act 1960 ceased (31st December 1999) and the Act commenced (1st January 2000). As discussed below, the intention was that the transition between the pilot programme and the new regime, operated by an approved organisation under the Act (ie AWINZ 2000), would be seamless. However, despite best intentions, things did not go precisely to plan as a rigorous examination of AWINZ's application continued right through 2000.
28. In 1998, in anticipation of the passing of the Act, the founding trustees, Nuala Grove, Sarah Giltrap, Graeme Coutts and myself, met and decided to form a trust, The Animal Welfare Institute of New Zealand, which it was intended, would become an approved organisation under the Act. This action had first been discussed with senior officials of the Ministry of Agriculture and Forestry.
29. The first draft of the Deed of Trust was written in 1998 but not signed as the Bill had not been passed and the criteria for approved status in the Bill were still under review. Nevertheless, the intention was clearly in place to create AWINZ 2000 from 1998.
30. On 22 August 1999 I wrote to the Group Director of MAF Biosecurity Authority giving notice of intent that AWINZ 2000 would apply for approved status under the Act upon it receiving Royal assent. **[Appendix E]**.
31. The Act was assented to by the Governor-General on 14th October 1999 and a formal application for approved status was made to the Hon. John Luxton, Minister of Food, Fibre, Biosecurity and Border Control, on 22nd November 1999 **[Appendix F]** The then Trustees then proceeded to execute the Trust Deed on 1st March 2000. **[Appendix G]**
32. Initially the application was rejected by the Minister of Agriculture on the grounds that not all the criteria of the Act had been met but after a robust dialogue with the Ministry of Agriculture and Forestry, which included extensive input from Crown Law and Kensington Swann (or KPMG Legal as it was then known), the Minister of Agriculture approved AWINZ 2000 on 19th December 2000 and the approval was Gazetted on 18th January 2001. **[Appendix H]**.

33. That initial Gazette Notice contained an error in that it referred to AWINZ 2000 as (Inc). That error was drawn to MAF's attention and on 8th March 2001 an amendment to the approval was Gazetted [**Appendix I**].
34. Subsequent to the Gazetting of AWINZ 2000 as an approved organisation the animal welfare officers employed by Waitakere and North Shore Cities were appointed inspectors under section 124 of the Animal Welfare Act 1999.
35. Section 121 of the Animal Welfare Act 1999, as it was finally worded, did not require an organisation seeking "approved status" to register as a body corporate. As a consequence the Trustees did not immediately seek to register the trust under the provisions of the Charitable Trusts Act 1957 as originally intended. Nor did they seek Inland Revenue Department approval for exemption from filing tax returns as there was no active business activity at that time.
36. Consideration was given to registering AWINZ 2000 under the Charitable Trusts Act 1957 but, as I was aware that new legislation was in the process of being introduced concerning charitable organisations which subsequently became the Charities Act 2005, I suggested that we hold off doing so until the new legislation was in place. This is a decision I now regret, as it left it open for Mrs Haden to register her own charity using the same name as AWINZ 2000, and much of the grief that followed that is recorded in both this affidavit and the pleadings occurred as a consequence.
37. For completeness, on 9th March 2005 AWINZ 2000 made application to Inland Revenue as an employer and for an IRD number. This was granted on 21st March 2005. Employer registration became necessary so that AWINZ could pay independent animal monitors working on movie productions. AWINZ 2000 is now registered as a charitable entity with the Charities Commission under the Charities Act 2005.

Movie Monitoring

38. In addition to its role with councils, a significant part of the business of AWINZ 2000 has been its involvement in the production of movies by providing independent animal welfare monitors who supervise the use of animals in those movies.
39. The seven movies in which AWINZ 2000 has had an involvement thus far are *The Lord Of The Rings Trilogy*, *The Lion*, *The Witch and the Wardrobe*, *The Bridge to Terabithia*, *Waterhorse*, and *Laundry Warrior*. *Waterhorse* is about to be released and *Laundry Warrior* is still in production.
40. As set out in paragraph 13 to 15 of the statement of claim, Mrs Haden made claims on the website www.awinz.co.nz that the then third defendant undertook movie monitoring work. To the best of my knowledge, those claims are false.

41. As set out in the next section of my affidavit, the false claims made by Mrs Haden have affected the business of AWINZ 2000. Before moving on to that topic however, I need to complete this background section by outlining the involvement of Mrs Haden which led to these proceedings being lodged.

Mrs Haden's involvement

42. The Court has previously heard, in the context of the parties' respective strike out applications, the background to Mrs Haden becoming involved in my affairs and the affairs of AWINZ 2000. Briefly:
- (a) Both Mrs Haden and I were involved in a voluntary organisation known as the Auckland Air Cadet Trust (AACT).
 - (b) There was a falling out between the AACT and Mrs Haden, which resulted in her being removed as treasurer of that organisation.
 - (c) Mrs Haden was upset at her removal. Believing me to be the prime architect of that, she began the campaign of actions and defamatory communications which form the main body of the statement of claim. The Court has already concluded that her motivations for doing so were malicious and primarily aimed at seeking "revenge" against me.
43. The primary forms which Mrs Haden's campaign have taken are:
- (a) Publishing material on the internet designed to discredit AWINZ 2000, call into doubt its legitimacy and make unfounded assertions as to the morality and legality of its actions. One such example is pleaded at paragraph 12 of the statement of claim. Other examples have been collated and are annexed as **Appendix J**.
 - (b) Publishing material on the internet, and in the form of letters to various parties, designed to discredit and humiliate me, and to undermine my own reputation. Representative examples of such material have been pleaded in paragraphs 20 to 35 of the statement of claim. Many more examples exist, including a significant volume of material that post dates the statement of claim.
 - (c) Telephoning and emailing trustees of AWINZ 2000 in an apparent attempt to intimidate and upset them. In this respect, I refer to the affidavit of Mr Coutts, who provides relevant evidence of a recent example of such an exchange. I am aware of several examples of such behaviour on the part of Mrs Haden, one of which led to the resignation of one of the original AWINZ 2000 trustees, Sarah Giltrap.
 - (d) Utilising the name of AWINZ Incorporated to interfere with the legitimate business activities of AWINZ 2000. This includes an

attempt to access the financial records of AWINZ 2000, and a threat to procure funds held by AWINZ 2000. In that respect, Mrs Haden sent to the plaintiffs in April 2007 an email which stated:

"a strange thing happened at the bank yesterday

We went to the bank to open an account and found that we already had four in our name and we have well in excess of \$100,000 in it in four accounts.

Apparently only one signatory and one name associated with it. very confusing. It was not a trading as account as you would expect but the name of the account is Animal Welfare Institute of New Zealand. that is our name. it was opened at Unitec and the accounts are kept at Mt Albert.

The Bank is sorting this one out , they have their lawyers on to it.

We also received a receipt as attached (blanked out though) and have made enquiries with the IRD

It appears that we are the only trust by the name of Animal welfare Institute of New Zealand that is listed as being able to offer donations tax free.

The investigations unit was very keen to hear about the four accounts but warned us that if we were to give up the name at this point in time we could be aiding and abetting an offence by being an accessory after the fact..

It puts us between a rock and a hard place but the good news is that we may be able to claim the money which is in our name so that we can cover the bills, unless legitimate ownership can be proved elsewhere."

A copy of that email, which was copied to Mayor Bob Harvey and Denis Sheard, Legal Counsel for Waitakere City, is attached as **Appendix K.**

The impact of Mrs Haden's actions on AWINZ 2000

44. In the last few years the New Zealand movie production industry has grown significantly and a number has included animal action.
45. Because of the likelihood of the first defendant locating and harassing any new staff member the first plaintiffs have been inhibited in recruiting new film monitors. This has placed undue pressure on the few experienced film monitors by having to cover all movies because AWINZ 2000 has been unable to broaden the number of monitors.
46. This has inhibited the development of training courses for new monitors for the same reason. The first plaintiffs are reluctant to publicise any new course for fear of the waters being muddied by the continuing activities of the first defendant.

47. Production staff on current movie production sets have asked questions about the web sites controlled by the first defendant that have been derogatory of the activities of the first plaintiff on previous movie productions.
48. An example serves to highlight the issue. While not of great importance to these proceedings *per se*, as the confusion was later sorted out, it does illustrate that the continued activities of Mrs Haden has the potential to be deleterious to the activities of AWINZ 2000.
49. It was reported to me that about July this year, when Sad Flutes Ltd was planning production for the movie *Laundry Warrior*, the Producer, Barrie Osborne, asked Moira Grant, the Unit Production Manager, to discuss with "AWINZ" the monitoring of the forthcoming movie.
50. Not having any contact details she went into www.awinz.co.nz, the web site controlled and written by the first defendant, through the auspices of her company Animal Welfare Institute of New Zealand Limited (of which she is the sole director and shareholder).
51. Moira advised me that on the home page she saw 'AWINZ Animal Welfare Institute of New Zealand Ltd' and assumed this was the organisation she was to contact. She went into a tag "animals in the movies" and was quite alarmed at first at the allegations she read but then came to the conclusion quite quickly that she was in the wrong website and contacted me by another means.
52. The example serves to highlight the fact that material published on the website not only has the potential to confuse the reader about AWINZ 2000, but also contains untrue information designed to discredit AWINZ 2000. By way of example, on one page, www.awinz.co.nz/movies1.htm is this reference:

"I searched the credits for

The lion the witch and the wardrobe and The water horse but have found no reference to the animal welfare institute being involved.

HOWEVER The water horse ..

Chris WELLS who is Neil Wells's wife has been supervising the animal activity on the set of this movie. We did not know that she is an animal welfare officer."

53. *Waterhorse* is about to be released in New Zealand cinemas and does in fact carry an end credit acknowledging that The Animal Welfare Institute of New Zealand monitored the animal action in the movie.
54. I also note that the words "Neil Wells" contains a hyperlink to a significant volume of untrue and defamatory material concerning me, some of which is the subject of these proceedings. I attach the relevant pages as **Appendix L**. These pages are representative of the material

that has appeared on web sites written and controlled by the first defendant since the statement of claim was filed.

55. Whilst I strongly deny much of that material, I understand that this is not the proper place to answer it. I simply note at this point that the use of the website www.awinz.co.nz in that manner has the self-evident potential to damage the legitimate business interests of AWINZ 2000.
56. A more concrete example of damage to AWINZ 2000 came very recently. On 1 November 2007 the North Shore City Council and Waitakere City Council agreed that the animal control field officers covering North Shore would be taken in-house by the North Shore City Council. They had previously been employed by Waitakere City Council under a contract. This effectively severed the relationship between North Shore City Council and AWINZ.
57. I was directly advised by Council staff that North Shore City Council decided not to continue with the appointments of the field staff as animal welfare inspectors because of the continual harassment by Haden against the first and second plaintiffs which included emails being sent to elected North Shore City Councillors. They wanted to distance themselves from "the Haden affair". This terminated an 8 year arrangement.
58. The continued harassment by the first defendant of any person associated with the first plaintiffs has also greatly inhibited the ability of the first plaintiffs to grow its activities.
59. With the resignation of two founding board members, Nuala Grove and Sarah Giltrap, the remaining Board members have been very reluctant to invite persons to become new members of the Board least they too be subjected to harassment by Mrs Haden. The affidavit of Mr Coutts highlights the very unpleasant issues that trustees of AWINZ 2000 face from Mrs Haden.
60. As a charitable trust, AWINZ 2000 is entirely reliant on the energies and efforts of its trustees and members, who offer their time voluntarily for a cause that they passionately believe in. I regard the efforts of Mrs Haden to attack and intimidate these people as frankly disgraceful.
61. The first defendant's actions have severely restricted the ability of the first plaintiff to raise funds for its activities. In both 2006 and 2007 fundraising appeals have been sent to owners of dogs in Waitakere appealing for funds for veterinary equipment for a new charity veterinary clinic. On both occasions the first defendant reproduced the fundraising letters on her website extolling readers not to contribute.

Impacts upon me

62. I have 2 children, Benjamin aged 23 and Amy aged 20. Both have been cadets in No. 3 (Auckland City) Squadron Air Training Corps and Ben is now a Pilot Officer. They are both mild mannered. Knowledge of the

continuing persecution by the first defendant has had a lasting affect on them. My son has expressed the wish to face the first defendant about the grief she was causing me and I have on more than one occasion dissuaded him. Although my family has supported me unstintingly throughout this matter it has caused considerable distress within my household.

63. By September 2006 the continuing effect of the proceedings and the continued harassment by the first defendant were having a profound effect on my health.

64. I consulted my GP, Dr Rob Stewart, on 25th September 2006 due to stress and increasing migraines, and he diagnosed significant ill health as a result of his work stress. He also found that I had lost over 6 kg in weight. **[Appendix M]**. His conclusion was:

Neil had lost weight, he had a dull headache. He found difficulty making decisions and stumbled over his words. He was waking at 0500 hrs and reported tiredness throughout the day.

Neil is usually a very capable, intelligent, articulate man. His presentation was completely out of character. Neil was not suicidal ...

65. Dr Stewart put me on 2 weeks sick leave which took up my entire sick leave entitlement. I took a further 2 weeks leave in November 2006 so that my wife and I could go away and try to deal with the pressures of coping with the ongoing persecution by the first defendant.

66. I have been seeing a counsellor each month since this matter started and am still under supervision of a counsellor.

67. The tangible impacts on my health and family life are just the "tip of the iceberg". It is perhaps difficult for the Court to fully comprehend the fundamental impact on one's life that a determined campaign such as Mrs Haden's can have. The knowledge that your name and reputation, which have taken a lifetime of passion and effort to build up, are being attacked from every conceivable angle, and pulled through the dirt in front of those that you respect most, is devastating.

68. Further, this is no isolated incident that can be contained, explained to those involved, and moved past. It is an ongoing orchestrated campaign of hatred that seems never ending. Every few months some new false claim is "added to the pile", requiring more effort on my part to try and counter, and bringing home afresh all of the anguish that I have already suffered. In a word, it is a nightmare.

69. The following is one recent example. On 21 November 2007 I received an email as follows: **[Appendix N]**

"FOR THE ATTENTION OF Mr NEIL WELLS

Dear Mr Wells

Greetings from across the years.

I have recently been investigating the whereabouts of the big cats formerly held at Waitakere City Council's failed fun park.

In 1991 it was agreed that they would be sent to the Performing Animals Welfare Society (PAWS) in California. PAWS however denies receiving the cats.

Given the substantial documentation earlier obtained under the Official Information Act, and as you were directly involved whilst as a representative for WSPA, please confirm if these magnificent animals did leave New Zealand as the public was informed, or as it is rumoured, they surreptitiously euthanised.

The latter is of concern as you were promoting this solution at the time.

Sir, I look forward to your early reply.

Rgds/Paul Burke"

70. I replied as follows: **[Appendix O]**

"Paul

Leisureland was not a "Waitakere City Council failed fun park." Leisureland was a failed private enterprise.

In 1991 all the big cats from the former Leisureland were transported in two separate shipments to Los Angeles by United Airlines. Auckland Zoo veterinarians volunteered to administer the sedatives required and WSPA volunteers assisted with the crating and transportation to Auckland International Airport.

All the cats (the lions and their cubs, and the tigers) were taken by Wildlife Waystation in Little Tujunga Canyon Road, Angeles National Forest, Los Angeles County.

PAWS did not take them as they had originally undertaken as they did not have adequate facilities to accommodate that number of animals. Congressman Lantos facilitated the contact with Wildlife Waystation. I visited them around 1992 and a MAF veterinarian also visited them a little later.

A few of the lions died a few years later from an outbreak of canine distemper, which up to that point had never been diagnosed in big cats anywhere in the world. The source of the virus was found to be feral raccoons.

I trust this information will dispel any rumours you may have heard.

Regards

Neil"

71. Within days details of the Leisureland Project appeared on a website controlled by the first defendant under the headline:

"NEW !!!!

Neil Wells the man from **AWINZ** rears his ugly head again!

Tiger Tiger burning bright did Neil Wells from WASP turn out your light ?"

72. Voluminous material from 1991 appeared under the webpage <http://publicwatchdogs.org.nz/neil%20wells%20WASP.htm>

This page is headed:

Familiar name crops up again

Neil Wells .. Labour crony has had a finger in the pie before the **AWINZ** deception, this man who has taken others to court for defamation and trumped up charges is showing his true colours in the correspondence he produces Here he doesn't hesitate to call the associates of the Cohen slime balls .. very professional Mr Wells! so where are the tigers and lions Now?

73. Other references in this website contain further allegations and hyperlinks —

The animals vanished without a trace!

This is a chronology of the correspondence note that it has since been proved that Neil Wells, Wayne Ricketts MAF and Vaughan Seed MAF are all mates in the same old boy network and support each other.

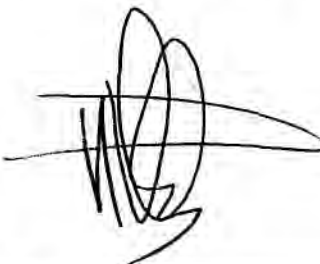
WELLS has since written the Animal welfare Act and has set up an organisation called **AWINZ** together with Wyn Hoadley and Graeme Coutts, read about this deception here **AWINZ**

read animals in the movies <http://awinz.co.nz/movies1.htm>

74. A long list of documents related to the Leisureland Project appear on the website but none of the hyperlinks work.
75. A further example of the first defendant's recent activities are the series of Parliamentary questions that she continues to ask through Rodney Hide MP as recently as 29th November 2007 **[Appendix P]**. The appendix show the ends to which she is prepared to go to undermine the activities of AWINZ 2000 but also shows that the Minister of Agriculture has repeatedly answered those.
76. My professional life has also suffered significantly. My relationship with Unitec is one example. I was first employed by Unitec as a lecturer in 1998 to develop a new course for animal welfare inspectors in preparation for the passing of the Animal Welfare Act. I rose to Associate Head of School until November 2006 when I resigned to take a new position at Waitakere City Council.
77. Unitec retained me as a part-time law lecturer and the Head of School informed me at the time of leaving in November 2006 that he was recommending that I be appointed Adjunct Professor.

78. That appointment did not eventuate and no explanation was offered at the time. I continued to lecture but in July 2007 my contract was not renewed.
79. In 2006 I was informed by a senior staff member that because of the continual harassment by the first defendant, "Unitec needs to keep you at arm's length."
80. The lost income from the lecturing contract is in excess of \$18,000 per annum. In 2006 it was \$13,319 (excluding GST). The same lectures, if carried out in 2007, would have been charged at \$18,612.
81. As at 5th December 2007 there are two web sites – www.awinz.co.nz and www.verisure.co.nz – controlled by the first defendant that continue to repeat the allegations that are the subject of these proceedings. An entire capture of these websites consists of hundreds of pages of duplicate documents so only the representative pages from www.awinz.co.nz are included [Appendix Q].
82. The Verisure website alone has 109 pages devoted to AWINZ 2000 and me personally but only representative pages are included [Appendix R].
83. In short, Mrs Haden's campaign against me has adversely affected virtually every aspect of my life for well over two years. My health, my career, my reputation and family have all suffered significantly. I want nothing more than for this very unhappy chapter to be closed, and to move on to the future. Mrs Haden's apparent obsession with me must stop, and that is why these proceedings have become necessary.

SWORN at AUCKLAND)
 this 10 day of December)
 2007 before me:)



(N E Wells)



A Solicitor of the High Court of New Zealand

PAULO REYES GARCIA
 SOLICITOR
 AUCKLAND