

Form 5A

Rule 5.02

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE

COMMONLAW DIVISION

S 01 2011 01484

MAJOR TORTS LIST

No. 2011

BETWEEN :

ROBERT RAYMOND CRIPPS

First Plaintiff

REDLEG MUSEUM SERVICES PTY LTD (ACN : 105 986 829)

Second Plaintiff

AND

DEMETRIOS VAKRAS

First Defendant

LEE-ANNE RAYMOND

Second Defendant

**WRIT**

---

Date of document: 31 March 2011

Filed on behalf of: The Plaintiffs

Prepared by:

**Tao Jiang Lawyers**

Level 1, 580 Barkly Street

Footscray West VIC 3012

Solicitors code: 28614

Tel: 1300 565 388

Fax: 03 8502 0302

Ref: R.Cripps032011

TO THE DEFENDANT

TAKE NOTICE that this proceeding has been brought against you by the plaintiffs for the claim set out in this writ.

IF YOU INTEND TO DEFEND the proceeding, or if you have a claim against the plaintiffs which you wish to have taken into account at the trial, YOU MUST GIVE NOTICE of your intention by filing an appearance within the proper time for appearances stated below.

YOU OR YOUR SOLICITOR may file the appearance. An appearance is filed by –



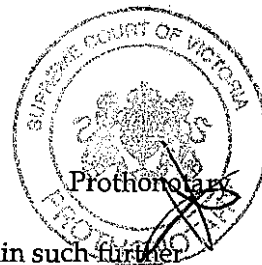
- (a) filing a "Notice of Appearance" in the prothonotary's office, 436 Lonsdale Street, Melbourne, or, where the writ has been filed in the office of a Deputy Prothonotary, in the office of that Deputy Prothonotary; and
- (b) on the day you file the Notice, serving a copy, sealed by the Court, at the plaintiff's address for service, which is set out at the end of this writ.

IF YOU FAIL to file an appearance within the proper time, the plaintiffs may OBTAIN JUDGMENT AGAINST YOU on the claim without further notice.

THE PROPER TIME TO FILE AN APPEARANCE is as follows—

- (a) where you are served with the writ in Victoria, within 10 days after service;
- (b) where you are served with the writ out of Victoria and in another part of Australia, within 21 days after service;
- (c) where you are served with the writ in New Zealand or in Papua New Guinea, within 28 days after service;
- (d) where you are served with the writ in any other place, within 42 days after service.

FILED: 1 - APR 2011



THIS WRIT is to be served within one year from the date it is filed or within such further period as the Court orders.

IN THE SUPREME COURT OF VICTORIA  
AT MELBOURNE  
COMMONLAW DIVISION  
MAJOR TORTS LIST

No. 2011

BETWEEN :

ROBERT RAYMOND CRIPPS

First Plaintiff

REDLEG MUSEUM SERVICES PTY LTD ( ACN 105 986 829)

Second Plaintiff

AND

DEMETRIOS VAKRAS

First Defendant

LEE-ANNE RAYMOND

Second Defendant

**STATEMENT OF CLAIM**

---

Date of document: 31 March 2011

Filed on behalf of: The Plaintiffs

Prepared by:

**Tao Jiang Lawyers**

Level 1, 580 Barkly Street

Footscray West VIC 3012

Solicitors code: 28614

Tel: 1300 565 388

Fax: 03 8502 0302

Ref: R.Cripps032011

---

A. FACTS RELEVANT TO CLAIMS AGAINST BOTH DEFENDANTS

(1) The First Plaintiff

1. The First Plaintiff is, and was at all times material to this proceeding:

(a) A business owner; and

(b) Engaged in the business of managing an art gallery under the business name Guildford Lane Gallery ["the Gallery"] for profit.

2. From 20 August 2003 until now, the First Plaintiff held the position as the managing director for the Second Plaintiff.

3. At all times material to this proceeding, the First Plaintiff is engaged in business of attracting artists to display their artworks in the Gallery for a fee and also engaged in business of attracting musicians and other business entities to utilize the resources of the Gallery for a fee.

(2) The Second Plaintiff is, and was at all times material to this proceeding:

(a) a company incorporated by law; and

(b) is carrying on the business under the trading name of "Guildford Lane Gallery" ["the Gallery"], is engaged in business of attracting artists to display their artworks in the Gallery for a fee, is engaged in business of attracting musicians and other business entities to utilize the resources of the Gallery for a fee and also is engaged in manufacturing of museum equipment and is running an artworks transportation business.

4. From 20 August 2003 until now, the First Plaintiff held the position as the managing director for the Second Plaintiff.

5. At all times material to this proceeding, the Second Plaintiff is engaged in business of attracting artists to display their artworks in the Gallery for a fee, is

engaged in business of attracting musicians and other business entities to utilize the resources of the Gallery for a fee and also is engaged in manufacturing of museum equipment and is running an artworks transportation business.

## B. FACTS RELEVANT TO CLAIMS AGAINST THE FIRST DEFENDANT

### (3) The First Defendant

6. The First Defendant is, and was at all times material to this proceeding:

(a) an artist; and

(b) lives with his partner who is the Second Defendant.

### (4) The Website Articles

7. At all times material to this proceeding:

(a) An international system of interconnected computer networks known as "the Internet", electronically linked together by globally unique addresses, and communicating by means of a common set of computer language protocols, existed for the exchange of information and data between computers;

(b) Within and as a feature of the Internet, a facility known as "the Web" existed for the storage, transmission and displaying of information and data in a format designed to be viewed on a computer terminal by means of software known as "web browsers";

(c) Information and data comprised on the Web was stored in individual packages, each with a unique address, known as "Web sites"; and

(d) Each Web site:

(i) Was stored on a specific computer known as a "host computer";

(ii) Was accessible from the host computer by means of an address protocol called a "hyper-text transfer protocol", known as a "Web address"; and

(iii) Could be accessed by any computer with an Internet connection and the appropriate software, via the relevant Web address.

8. On or about June 2009

(a) the First Defendant published the article "**the Vakras Article One**" on the Website <http://www.vakras.com/gwb/exhibitions.html>, concerning the First and the Second Plaintiffs and the First Defendant published the same article by updating the article on or about 26<sup>th</sup>. September 2010, this article can be accessed and read by any person having a computer with an Internet connection and the appropriate software, by means of the said Web address.

(b) The article ("**the Vakras Article One**") under the heading "exhibition in 2009 HUMANIST TRANSHUMANIST: the fiasco of Guildford Lane Gallery of Melbourne" in the following terms appears on the said Website:

Guildford Lane Gallery is run by the toxic Robert Cripps. AVOID THIS GALLERY ASSIDUOUSLY!

Much money was spent by myself and my co-exhibitor Lee-Anne Raymond to make this show a success. This has turned out to be a waste of money. The owner, Robert Cripps, had, at the time of writing this, still not paid us for work that sold during the show [payment was eventually made over 6 weeks later - after we sought legal advice].

During the course of the exhibition he, by his actions, circumvented our capacity to promote our work. His idea of a contract, we were to soon discover, is that he believes he can unilaterally insert conditions subsequent to any original agreement. The result of his actions was the sabotage of the exhibition. Cripps turned the exhibition into an expensive debacle for us, but he made a profit on it.

.....

Cripps is a self-confessed racist [this page is expanded here]

He is a manifestation of the new-left who have adopted the sentiments Hitler expressed in his Mein Kampf, but who believe that, though theirs and Hitler's sentiments are the same, their racism is a 'justifiable' one [expanded here]. Cripps took exception to my explanatory essays..... Yet it was not the exposure of the Biblical basis of Hitler's racism that Cripps took exception to. His actual objection was to my quoting from the Koran, particularly 9.38-52, in which the god of Islam, "Allah", guarantees automatic "martyrdom" to those who are killed while in the act of killing non-Muslims.

According to Cripps, quoting the Koran is insensitive to "Palestine", because he is opposed to, as he said, "the Jew's state in Palestine." He then accused me of "racism"! (Neither "Israel" or "Palestine", or the conflict there are mentioned in the exhibition)

Cripps, who does not know the difference between opinion and fact, placed disclaimers everywhere in the exhibition.....

The quotes from the Koran though are NOT an opinion. What quoting from the Koran achieved was the exposure of Cripps for what he is: a racist.

Unfortunately, some of the photographs are not in focus (limited depth of field). When Lee-Anne and I visited to photograph our exhibition, he followed us,

harried us, ranting, ordering us out of our exhibition, even though we had a legal right to be there, and he had no legal means of executing his demand. He is a bellicose bully limited in erudition and of limited intellect.....

It became evident that Cripps was utterly ignorant of surrealism, ignorant of its counter-cultural, counter-religious, and therefore its original revolutionary intent. [To read the review of this exhibition by my co-exhibitor, Lee-Anne Raymond ]

(c ) By clicking on the link "this page is expanded here" in the **Vakras Article One**, the First Defendant published another article "**the Vakras Article Two** ") concerning the First and the Second plaintiffs , under the heading " exhibition in 2009 HUMANIST TRANSHUMANIST: the fiasco of Guildford Lane Gallery of Melbourne the extended version" in the following terms appears on the said Website, with website address:

[http://www.vakras.com/guildford\\_lane\\_gallery.html](http://www.vakras.com/guildford_lane_gallery.html), and the First Defendant published the same article by updating the article on or about 26<sup>th</sup>. September 2010, this article can be accessed and read by any person having a computer with an Internet connection and the appropriate software, by means of the said Web address.

**Guildford Lane Gallery is run by the toxic Robert Cripps. AVOID THIS GALLERY ASSIDUOUSLY!**

Had I been aware of him, or had information on him been available prior to our agreeing to exhibit at Guildford Lane Gallery I (and my co-exhibitor, Lee-Anne Raymond) would NEVER have dealt with him. This page expands on criticism already made about the experience of exhibiting at his gallery [exhibitions].

There are several words with which I can describe Cripps: poisonos, vile, repellent, malignant, racist, liar, bellicose, bully, stupid....



Cripps also runs Redleg a transporter of art, can you trust Cripps' Redleg?

Much money was spent by myself and my co-exhibitor Lee-Anne Raymond to make this show a success. This has turned out to be a waste of money. The owner, Robert Cripps, had, at the time of writing this, still not paid us for work that sold during the show [payment was eventually made over 6 weeks later - after we sought legal advice]. Payment of moneis owed was only secured when we were forced into 'agreeing' to terms which were never in the original contractual agreemnet with Cripps, but which he demanded we agree to. He gained 'agreement' by placing us under financial duress. That he procured 'agreement' by duress renders this 'agreement' legally voidable.

During the course of the exhibition he, by his actions, circumvented our capacity to promote our work. Cripps turned the exhibition into an expensive debacle for us, but he made a profit on it.....

Cripps is a self-confessed racist [the new-left Nazis]. He is a manifestation of the new-left who have adopted the sentiments Hitler expressed in his Mein Kampf, but who believe that, though theirs and Hitler's sentiments are the same, their racism is a 'justifiable' one [new-left Nazis].

Cripps took exception to my explanatory essays.

Yet it was not the exposure of the Biblical basis of Hitler's racism that Cripps took exception to. His actual objection was to my quoting from the Koran, particularly 9.38-52, in which the god of Islam, "Allah", guarantees automatic "martyrdom" to those who are killed while in the act of killing non-Muslims.

According to Cripps, quoting the Koran is insensitive to "Palestine", because he is opposed to, as he said, "the Jew's state in Palestine." He then accused me of

"racism"! (Neither "Israel" or "Palestine", or the conflict there are mentioned in the exhibition)

For Cripps the actions of "Palestinian" (Arab Muslim) suicide murderers in killing Jews are justified. My quotes from the Koran show unambiguously that these acts are crimes committed on behalf of Islam. These quotes mean:

- that the Jews killed in Israel are victims of Islamic intolerance;
- that the Jews have not brought the situation upon themselves by their actions to which "Palestinians" are reacting. The Koran predates the existence of the modern state of Israel by over 1300 years;
- that his hatred of Jews is exposed for the outright racism that it is.....

The quotes from the Koran though are NOT an opinion. What quoting from the Koran achieved was the exposure of Cripps for what he is: a racist.

Unfortunately, some of the photographs are not in focus (limited depth of field). When Lee-Anne and I visited to photograph our exhibition on 25 June 2009, he followed us, harried us, ranting, ordering us out of our exhibition, even though we had a legal right to be there, and he had no legal means of executing his demand. He is a bellicose bully limited in erudition and of limited intellect.....

His intimidatory behaviour included him walking to within a few inches of me to tell me that I threaten him, and thrusting his finger to within an inch of me to tell me he was frightened of me, and to tell me that I breached our contractual agreement because he claimed that my art was racist. (A gallery visitor who was present witnessed these bizarre antics.) Rebuttals by Lee-Anne to Cripps' bizarre rants were met with the retort "you are a sarcastic woman". With regard to the above Cripps email, no discussion about the themes of my art occurred with anyone from the gallery other than with Cripps himself, for anyone other than Cripps to feel "uncomfortable". Cripps' conduct throughout was thoroughly disgraceful.

Since the staff and volunteers at Cripps' Guildford Lane Gallery acquiesce to, and agree with, his hatred of Jews and are in disagreement with me, then it would be a disservice to them if they were to remain unacknowledged and anonymous. ....

It is my stance that an action or inaction should never be without consequence. Like the Nazis before her Yollande Pickett might in the future claim to have been following orders.....

As the course of events transpired during the course of the exhibition at this odious gallery, I often wished that a page such as this had existed on the internet. I never would have wasted the large amount of time, money, effort, and frustration by exhibiting in it. This page is intended to remedy such an absence.

.....

The bona fides of Guildford Lane Gallery. The gallery is listed by NAVA Bodies like the National Association for the Visual Arts (NAVA), of which I was once a member, and which is itself funded by the Australian Federal Government, the Australia Council, etc, is intended to support artists and the arts community. However, NAVA lends this disreputable gallery credibility. NAVA is doing artists a disservice

Other bodies that lend Cripps' gallery credibility are Artabase.  
<http://artabase.net/exhibition/877-guildford-lane-gallery-volunteer-program>  
The Artabase site hosts Cripps' "volunteer program". These listings are misleading! Do not be misled. Avoid Guildford Lane Gallery 20-24 Guildford Lane, Melbourne, Vic. Australia! [ To read the review of this exhibition by my co-exhibitor, Lee-Anne Raymond ]

(d) The Website Articles "**the Vakras Article One**" and "**the Vakras Article Two**" can be accessed and read by any person having a computer with an

Internet connection and the appropriate software, by means of the said Web address.

9. The words of the " **the Vakras Article One**" and "**the Vakras Article Two**" :

(a) published of and concerning the First and Second Plaintiffs, the material identifies the First and Second Plaintiffs clearly by names; and

(b) defamatory of the First Plaintiff and

(c ) are false and the words were maliciously published, they were calculated in the ordinary course of things to produce, and they do produce actual loss and damage to the Second Plaintiffs' commercial and business interests.

10. In their natural and ordinary meaning, the words of the "**Vakras Article One**" and the "**Vakras Article Two**" mean, and understood to mean, that the First Plaintiff:

(a) is toxic;

(b) runs a business which should be avoid ASSIDUOUSLY;

(c) runs a business which is a complete failure;

(d) wasted the Defendants' money by having their artworks exhibited in the gallery;

(e) did not want to pay the Defendants for work ;

(f) Circumvented the Defendants' capacity to promote their work.

(g) Unilaterally inserted conditions subsequent to any original agreement;

(h) sabotaged the Defendants' exhibition;

(i) turned the exhibition into an expensive debacle for the Defendants;

(j) made money on the sacrifice of the Defendants;

(k) is a self-confessed racist;

- (l) is a manifestation of the new-left who have adopted the sentiments Hitler expressed in his Mein Kampf;
- (m) took unreasonable exception to the Defendants' explanatory essays;
- (n) accused the Defendants of "racism";
- (o) caused loss and damages to the Defendants by placing disclaimers in the gallery;
- (p) is a racist;
- (q) followed and harassed the artists, ranting, ordering the Defendants out of the exhibition;
- (r) is a bellicose bully limited in erudition and of limited intellect;
- (s) is utterly ignorant of surrealism, ignorant of its counter-cultural, counter-religious, and therefore its original revolutionary intent;
- (t) is poisonous;
- (u) is vile;
- (v) is repellent;
- (w) is malignant;
- (x) is a liar;
- (y) is a bully;
- (z) is untrustworthy;
- (aa) forced the Defendants into 'agreeing' to terms which were never in the original contractual agreement;
- (bb) gained "agreement" by placing the Defendants under financial duress;
- (cc) reneged/repudiated his contractual obligations;
- (dd) did not care about his contractual and professional obligations;
- (ee) is a person who, without proper cause or reasonable excuse, breaches agreements and is therefore disrespectful and acts with disregard to those with whom he enters into agreements;
- (ff) justifies the actions of "Palestinian" (Arab Muslim) suicide murderers in killing Jews;
- (gg) is hatred of Jews;
- (hh) acted intimidatorily towards the Defendants;

- (ii) acted bizarrely;
- (jj) accused the Second Defendant of being a sarcastic woman;
- (kk) acted thoroughly disgraceful;
- (ll) wasted the Defendants large amount of time, money, effort and caused them frustration;
- (mm) Is a person who makes a nuisance of himself;
- (nn) is not a bona fide gallery manager;
- (oo) is engaged in misleading activities;
- (pp) committed misconduct in the Gallery;
- (qq) lacks integrity in his profession as a Gallery manager;
- (rr) deliberately set out to cause distress to the Defendants;
- (ss) is a person with strange ideas, philosophies or phobias;

#### C. FACTS RELEVANT TO CLAIMS AGAINST THE SECOND DEFENDANT

##### (5) The Second Defendant

11. The Second Defendant is, and was at all times material to this proceeding:

- (a) an artist; and
- (b) lives with her partner who is the First Defendant.

##### (6) The Website Article

12. At all times material to this proceeding:

- (a) An international system of interconnected computer networks known as "the Internet", electronically linked together by globally unique addresses, and communicating by means of a common set of computer language protocols, existed for the exchange of information and data between computers;

(b) Within and as a feature of the Internet, a facility known as "the Web" existed for the storage, transmission and displaying of information and data in a format designed to be viewed on a computer terminal by means of software known as "web browsers";

(c) Information and data comprised on the Web was stored in individual packages, each with a unique address, known as "Web sites"; and

(d) Each Web site:

(i) Was stored on a specific computer known as a "host computer";

(ii) Was accessible from the host computer by means of an address protocol called a "hyper-text transfer protocol", known as a "Web address"; and

(iii) Could be accessed by any computer with an Internet connection and the appropriate software, via the relevant Web address.

13. On or about June 2009

(a) the Second Defendant published the article "**the Raymond Article**" on the Website <http://www.leeaneart.com/guildfordlanegallery.html>, concerning the First and the Second Plaintiffs, the article can be accessed and read by any person having a computer with an Internet connection and the appropriate software, by means of the said Web address

(b) The article ("**the Raymond Article**") under the heading "Guildford Lane Gallery, Last updated 26th September 2010, Robert Cripps of Guildford Lane Gallery is at it again, and again, and again" in the following terms: appears on the said Website:

26th September 2010

Another artist reports to me they were humiliated and embarrassed by Cripps's behaviour at their opening and throughout the duration of the exhibition. (What I struggle to understand is how he is still permitted to engage volunteers and operate as the director of a gallery at all.)

This is a pattern of behaviour, artists be warned and beware.

6th June 2010

A life model reported to me how he found Cripps' "...treatment was unbearable." This person had been wrongly paid and dared to question Cripps and was victimised for it.

26th May 2010

An artist reports her reputation and exhibition were "destroyed" by Robert Cripps and his bizarre unchecked antics.

When will any official arts reviewer, so called artists support organisation or arts writer/publisher have the guts to do anything about him? Arts Law must have volumes dedicated to complaints just about Cripps. Like Demetrios Vakras and I you will get nothing but useless mutterings "how awful", well that isn't good enough. In our case a review supporting the show and its purpose or even critiquing it properly would have been the expectation. But no, what we received was much less than nothing, we were left to hang. This will happen to you too. It is time to out Cripps for what he is. If you have had a similar experience with this pariah of a man then let me know and I'll post it to this page as a warning to other artists. Say NO to Guildford Lane Gallery under the steerage of Robert Cripps. Say NO to being abused and having your show destroyed and your reputation sullied and then receive no support or back up. Say NO more to providing Cripps with the oxygen to continue running this gallery. Say NO to Guildford Lane Gallery and go elsewhere. By the way this man also runs Red



Leg an arts transportation company, in this context I am aware that he is professionally avoided. Others without direct experience of Cripps are well aware of his reputation, he is, as reported to me, "universally despised". If this isn't enough read on. If you still think you won't experience this sort of treatment it doesn't matter, he will treat others this way and your support just keeps him in business to do so.

In my own experience...let's see, at my exhibition what did he do that would suggest he is a creep and his motivations suspect? My paintings display nudes, generally, though not always, from the back. He embarrassed me, and the entire concept of the show, by asking women at the opening, "is that your lovely bottom?" What did he do to display he is a bully? He stood an inch from my face and screamed at me in front of visitors to the gallery and gallery volunteers. When I moved back he moved forward. He did the same to Demetrios. He poked aggressively at our chests and shouted his foul abuse and we stood our ground. He was incensed that we wouldn't back down, that we would dare to stand up to him and for our character and our exhibition.

Anyone who works or volunteers for him who doesn't support this account of the kind of person he is, is a coward and an enabler of a bully and a lecher. There were at least 3 volunteers visible and in earshot of the incident I have referred to. Present as well was the paid Gallery Manager who during Cripps' tirade remained his silent lackey, saying and doing nothing of honour. All who were there at the time know you did nothing. How many times has it been that you did nothing? I'm sending out the call to all "his women", this is what he calls you, (he is only interested in young inexperienced women and men too weak to stick up for themselves it seems) to come forward and report his behaviour, equip people with the knowledge to avoid him before they come into his employ or anywhere near paying him money for art space rental.

How many people must he dishonour and ill treat with his shameful antics?

People with any notion of self respect simply leave his gallery, but no one ever does anything about it to prevent the next person making the same mistake to 'work' for him. You are meaningless to him and he has no respect for you; he is a narcissist without scruples who stands not for art but for himself and the appeasement of his own appetites. I notice that even more and more associates are included into the Guildford Lane Gallery venue. Melbourne Life Drawing and Utopian Slumps to name two. How is this arrangement going for you?

Contact Lee-Anne to post your experience  
from personal experience ~ a review of guildford lane gallery

If an artist or interested person were to ask me, how did your show go?...what was the gallery like?...did you have a good experience? I would have to say in order; terribly; an impressive space to be avoided at all costs and, no, it was the worst experience and one I could never have imagined. Why?

No more than 5 minutes after the close of our opening night event my co-exhibitor, Demetrios Vakras, and I were subjected to a truly sickening tirade of insult by the Director, Robert Cripps. The basis for his tirade, directed mostly at my co-exhibitor was that Cripps had taken exception to one aspect of religious criticism in the exhibition. In his tirade we were informed without invitation, that he (Cripps) was anti the Jewish State and pro Palestinian. There was no reference to this conflict in the content of exhibition. Nevertheless he demanded it be removed. We left that evening, without resolution to this extremely insulting accusation and with Cripps claiming later to anyone who would listen to his bombast that he was 'attacked' by us. We subsequently returned to the exhibit some days later to photograph the installation. (See the above photograph which is one of the few good ones and one of the few we were able to take) We only managed to take very few shots of the show as during our attempt to document the exhibition Robert Cripps proceeded to shadow us around our rented space declaring once more that Demetrios and the show was racist. He had installed

several "disclaimer" notices within the exhibition space (we'd hired the entire 2nd floor) and at the first ramp of the stair way leading up to the space a huge "WARNING" sign was posted.

When a gallery of its own volition does this, it says more about the gallery direction than anything else but damage is also done. It was effective enough to cast a pall over the content and therefore overall reception of the show, which was up for three weeks at the mercy of Cripps' vile interpretations. It was very effective, a complete sabotage, the gallery had all the money it was ever going to get out of us after all and didn't need to support sales of our art or our self produced catalogue in order to make any profit. It is all about the money at Guildford Lane Gallery. If it were about the art, the gallery Director would of course already know that Surrealism is a protestant movement, one born from a fiercely anti establishment, anti-religious, anti-discrimination and anti-violence background. With particular emphasis on anti-violence purportedly performed in the name of religion.

What of the content? This exhibition was well announced to the Director and his staff, well documented in our formerly welcomed application to be a return to Surrealism's roots, an unapologetic announcing of Surrealism's origins and traditional temperament. No saccharine coated pop-version of surrealism by designers. This means religion is critiqued. Cripps though only cared about criticisms of Islam, not Christianity, Hinduism, Zoroastrianism or Judaism. The content, it was claimed, was racist towards Islam alone. The critiques on Islam were backed up by quotation from the Koran with passages extolling violent action and misogyny. Quotations were referenced to emphasise the problems and significant contradictions between the text and claims made about this religion. Quotation from the Bible similarly prominent was undisputed and not a concern for Cripps. The point of logic presented to Cripps that Islam is multi-racial so criticism of the religion cannot be racial was rejected. He further claimed to be threatened by us and that neither could visit the space we hired without

prior warning and that Demetrios was just not to come at all. Never mind that as renters we had a clear right to be present during business hours this was all declared by Cripps whilst inches from us in a posture one might find very contradictory to this claim (we couldn't back away he kept moving in). This occurred all in the presence of a visitor to the gallery whom we did not know, she remained although initially hesitated when coming upon the exchange, but then she stayed, read everything and she came to us when Cripps left the space to reassure us that there was nothing to his accusation, she could "see what we were doing" and that the work was "amazing" - she said she'd be back to see it more, I hope she did.

I wonder how many turned around and left the space when coming upon the disclaimers, or how many were treated to a special audience by the director. I can't know this for sure and can only reasonably speculate of course but it stands to reason. To add further insult we had to fight for six weeks post the closure of the show to receive our sale money and bond money owed. It wasn't a large amount, but we were not prepared to let the gallery retain it. It was a further self-discrediting act by this gallery in my opinion. So beware artists, take care to research your gallery selections well, I hope this helps you.

If asked by a prospective artist applicant to the gallery for an assessment I would have to say think twice before being lured by Guildford Lane Gallery's undeniably striking interior, it comes at a significant cost.

Review the account of my co-exhibitor Demetrios Vakras here:

[http://www.vakras.com/exhibitions.html#exhibition\\_in\\_2009](http://www.vakras.com/exhibitions.html#exhibition_in_2009)

(c) The Website Article "**the Raymond Article**" can be accessed and read by any person having a computer with an Internet connection and the appropriate software, by means of the said Web address.

14. The words of the **the Raymone Article** " were

(a) published of and concerning the First and Second Plaintiffs, the material identifies the First and Second Plaintiff clearly by names; and

(b) defamatory of the First Plaintiff and

(c) are false and the words were maliciously published, they were calculated in the ordinary course of things to produce, and they do produce actual loss and damage to the Second Plaintiffs' commercial and business interests..

15. In their natural and ordinary meaning, the words of the "**Raymond Article**" mean, and understood to mean, that the First Plaintiff:

- (a) humiliated and embarrassed the Defendants;
- (b) is incompetent to engage volunteers and operate a gallery;
- (c) has a pattern of bad behavior that artists should be warned and beware;
- (d) Treated life model unbearably;
- (e) Will victimize whoever dares to question the first Plaintiff;
- (f) Destroyed the reputation and exhibition of the Defendants;
- (g) Acted bizarrely and unchecked;
- (h) An awful man;
- (i) Should be investigated by the Arts Law;
- (j) Failed to respond to the Defendants' request during the exhibition;
- (k) Is a terrible person to deal with;
- (l) Abused the Defendants;
- (m) Had the Defendants' show destroyed and their reputation sullied;
- (n) Offered no support or back up for the Defendants;
- (o) Not qualified to run the gallery business;
- (p) is professionally avoided;
- (q) Is universally despised;
- (r) should not run business at all;

- (s) is a creep;
- (t) Embarrassed the Second Defendant, and the entire concept of the show;
- (u) is a bully;
- (v) screamed at the Second Defendant in front of visitors to the gallery and gallery volunteers;
- (w) Acted very aggressively;
- (x) shouted foul abusive language;
- (y) is a coward;
- (z) Is an enabler of a bully;
- (aa) Is a lecher to women artists;
- (bb) runs a business whose staff are young inexperienced women and men too weak to stick up for themselves to come forward and report his behaviour;
- (cc) Should be avoided as an employer;
- (dd) Should be avoided as a business partner;
- (ee) is dishonourable;
- (ff) kills treat people with his shameful antics;
- (gg) is a mistake to 'work' for him;
- (hh) has no respect for people;
- (ii) is a narcissist without scruples who stands not for art but for himself and the appeasement of his own appetites;
- (jj) Runs a terrible gallery;
- (kk) Runs a gallery should be avoided at all costs;
- (ll) Will give the artists the the worst experience and one could never have imagined.
- (mm) Gave the Defendants a truly sickening tirade of insult;
- (nn) was anti the Jewish State and pro Palestinian;
- (oo) made extremely insulting accusation to the Defendants;
- (pp) Accused the Defendants and the show were racist;
- (qq) Would not allow the Defendants to take photos of their work;
- (rr) Deliberately and effectively did a complete sabotage of the Defendants' exhibition;

- (ss) did not support sales of the Defendants' art;
- (tt) only cares about the money and do not about the art;
- (uu) only cared about criticisms of Islam, but not Christianity, Hinduism, Zoroastrianism or Judaism;
- (vv) was racist towards Islam alone;
- (ww) Did not allow the Defendants to come to the gallery at all despite the renting agreement and the renter's right;
- (xx) Slow in payment for sale money and bond money owed.
- (yy) Is self-discrediting;
- (zz) Manages the gallery in such a manner that will always comes at a significant cost to the exhibitors at the gallery.

(7) Loss and damage

16. By reason of the publication of the "**the Vakras Article One**" and "**the Vakras Article Two**" and "**Raymond Article**" (collectively "**the Articles**"), the First Plaintiff:

(a) Was greatly injured in his credit, character and reputation, both privately and in his business as a gallery, museum equipment and artworks transportation business owner; and

(b) Suffered great anguish, distress and embarrassment.

17. Further:

(a) By reason and in consequence of the First and Second Defendant's conduct in publishing **the Articles**, the Second Plaintiff's reputation was injured to such an extent that:

(i) The Second Plaintiff's business lost customers and

(ii) The Second Plaintiff's business failed to attract new customers;

(b) By reason and in consequence of the First and Second Defendant's said conduct, the First Plaintiff suffered acute stress and depression, which prevented him from properly attending to the affairs of the Second Plaintiff's business;

(c) At the time when the Plaintiff was experiencing the consequences referred to in sub-paragraphs (a) and (b) hereof:

(i) Many artists and commercial enterprises were seeking to establish or improve their business relationship with the Plaintiffs; and

(ii) Many opportunities therefore existed for the Plaintiffs' business, both to consolidate its relationship with existing customers, and to attract new customers;

(d) Due to the consequences referred to in sub-paragraphs (a) and (b) hereof, the Plaintiffs' business was not able to exploit the opportunities which then existed for it to:

(i) Consolidate its relationship with existing customers; or

(ii) Attract new customers;

(e) The Plaintiffs' business thereby missed out on the benefits of a unique period of opportunity to:

(i) Maintain the loyalty of existing customers;

(ii) Attract new business from existing customers;

(iii) Attract new customers;



(iv) Enhance its reputation as a gallery and a supplier of arts and museum-related services; and

(v) Grow to be a larger, more successful, and more profitable business;

(f) The amount of actual economic loss and damage suffered by the Second Plaintiff in respect of the Second Plaintiff's business due to the matters referred to in the preceding sub-paragraphs hereof is incapable of precise quantification, but it is estimated by the Second Plaintiff to be:

(i) In the 2010 calendar year, \$50,000.00;

(ii) In the 2011 calendar year, to date, \$90,000.00;

(g) Such economic loss and damage is continuing, and will continue to accrue.

(8) Exemplary, aggravated and punitive damages

18. The First and Second Defendants published each of **the Articles**:

(a) the defendants published imputations pleaded above herein in circumstances where they were aware that the meanings pleaded herein ("the defamatory meanings"), were not true;

(b) Without giving the Plaintiffs any opportunity, or any reasonable opportunity, to comment on or correct the articles, insofar as they conveyed the defamatory meanings; and

(c) With reckless disregard for the truth or falsity of the defamatory meanings.

(d) having published the matters complained of, refused to remove the defamatory articles, refused to publish an apology to the Plaintiffs for the publication of the matters complained of and thereby displayed a lack of contrition for the publication of the matters complained of;

#### PARTICULARS

(i) on 22 February 2011, the First Plaintiff' solicitors wrote to the Defendants alleging that the First Plaintiff had been defamed by the matters complained of and demanding that the Defendants immediately remove the offensive website link. The Defendants never responded.

(ii) on 15 March 2011, the Plaintiffs' solicitors wrote to the Defendants in great details, alleging that the First Plaintiff had been defamed by the matters complained of and the articles have given rise to a cause of action in Injurious Falsehood against the Defendants, demanding that the Defendants immediately remove the articles and requesting a written public apology and/or correction and demanding that the Defendants cease to engage in any further defamation and false publication in relation to the Plaintiffs. The letters were sent out by registered mails to the Defendants and the Defendants signed the receipts. The Defendants never responded.

19. The First and Second Defendants deliberately framed and expressed the articles so that their tone and language conveyed a very harmful and sinister impression by:

**(a) In the Articles:**

(i) Using emotive, inflammatory, extravagant and sensational language:

## PARTICULARS

Guildford Lane Gallery is run by the toxic Robert Cripps. AVOID THIS GALLERY ASSIDUOUSLY! .....

Cripps is a self-confessed racist [this page is expanded here].....

He is a manifestation of the new-left who have adopted the sentiments Hitler expressed in his Mein Kampf, .....

What quoting from the Koran achieved was the exposure of Cripps for what he is: a racist.....

He is a bellicose bully limited in erudition and of limited intellect.....

It became evident that Cripps was utterly ignorant of surrealism, ignorant of its counter-cultural, counter-religious, and therefore its original revolutionary intent. [To read the review of this exhibition by my co-exhibitor, Lee-Anne Raymond.....

Had I been aware of him, or had information on him been available prior to our agreeing to exhibit at Guildford Lane Gallery I (and my co-exhibitor, Lee-Anne Raymond) would NEVER have dealt with him. This page expands on criticism already made about the experience of exhibiting at his gallery [exhibitions].....

There are several words with which I can describe Cripps: poisonous, vile, repellent, malignant, racist, liar, bellicose, bully, stupid....

Cripps also runs Redleg a transporter of art, can you trust Cripps' Redleg?.....

Cripps is a self-confessed racist [the new-left Nazis]....

It is my stance that an action or inaction should never be without consequence. Like the Nazis before her Yollande Pickett might in the future claim to have been following orders...

As the course of events transpired during the course of the exhibition at this odious gallery, I often wished that a page such as this had existed on the internet. I never would have wasted the large amount of time, money, effort, and frustration by exhibiting in it. This page is intended to remedy such an absence.....

These listings are misleading! Do not be misled. Avoid Guildford Lane Gallery 20-24 Guildford Lane, Melbourne, Vic. Australia! [ To read the review of this exhibition by my co-exhibitor, Lee-Anne Raymond ].....

(What I struggle to understand is how he is still permitted to engage volunteers and operate as the director of a gallery at all.) .....

This is a pattern of behaviour, artists be warned and beware.....

Arts Law must have volumes dedicated to complaints just about Cripps. Like Demetrios Vakras and I you will get nothing but useless mutterings "how awful", well that isn't good enough. In our case a review supporting the show and its purpose or even critiquing it properly would have been the expectation. But no, what we received was much less than nothing, we were left to hang. This will happen to you too.....

It is time to out Cripps for what he is. If you have had a similar experience with this pariah of a man then let me know and I'll post it to this page as a warning to other artists. Say NO to Guildford Lane Gallery under the steerage of Robert Cripps. Say NO to being abused and having your show destroyed and your reputation sullied and then receive no support or back up. Say NO more to

providing Cripps with the oxygen to continue running this gallery. Say NO to Guildford Lane Gallery and go elsewhere. By the way this man also runs Red Leg an arts transportation company, in this context I am aware that he is professionally avoided. Others without direct experience of Cripps are well aware of his reputation, he is, as reported to me, "universally despised". If this isn't enough read on. If you still think you won't experience this sort of treatment it doesn't matter, he will treat others this way and your support just keeps him in business to do so.....

How many people must he dishonour and ill treat with his shameful antics? People with any notion of self respect simply leave his gallery, but no one ever does anything about it to prevent the next person making the same mistake to 'work' for him. You are meaningless to him and he has no respect for you; he is a narcissist without scruples who stands not for art but for himself and the appeasement of his own appetites.....

This means religion is critiqued. Cripps though only cared about criticisms of Islam, not Christianity, Hinduism, Zoroastrianism or Judaism.....

So beware artists, take care to research your gallery selections well, I hope this helps you.....

If asked by a prospective artist applicant to the gallery for an assessment I would have to say think twice before being lured by Guildford Lane Gallery's undeniably striking interior, it comes at a significant cost.....

Review the account of my co-exhibitor Demetrios Vakras here:

[http://www.vakras.com/exhibitions.html#exhibition\\_in\\_2009](http://www.vakras.com/exhibitions.html#exhibition_in_2009).....

(b) asserting as facts matters which are unsourced and unattributed, including that:

(i) quoting by persons who are not identified;

#### PARTICULARS

6th June 2010

A life model reported to me how he found Cripps' "...treatment was unbearable."....

26th May 2010

An artist reports her reputation and exhibition were "destroyed" by Robert Cripps and his bizarre unchecked antics.....

20. Taken together, **the Articles** comprise a deliberate and concerted attempt by the First and Second Defendants to:

(a) Hold the First Plaintiff up to scorn, derision, ridicule, humiliation and contempt;

(b) Utterly destroy the First Plaintiff's credibility and reputation; and

(c) Cause the First Plaintiff extreme hurt, embarrassment, annoyance and distress.

21. In the premises pleaded in the preceding paragraphs hereof:

(a) The First and Second Defendants, in publishing **the Articles** conveying the defamatory meaning:

(i) Acted with actual malice, spite, ill-will and vindictiveness against the First Plaintiff; and

(ii) Showed contumelious disregard and contempt for the First Plaintiff's feelings and reputation; and

(b) Is therefore liable to an award of aggravated, exemplary and punitive damages.

**THE FIRST PLAINTIFF CLAIMS:**

(1) As against both Defendants, damages (including aggravated, exemplary and/or punitive damages) for defamation, together with interest on such damages and costs;

(2) As against both Defendants, such further or other relief as the Court thinks fit.

**THE SECOND PLAINTIFF CLAIMS:**

(1) As against both Defendants, actual damages for injurious falsehood. together with interest on such damages and costs;

(2) As against both Defendants, such further or other relief as the Court thinks fit.

The Plaintiffs do not require a Jury.

Signed: Tao Jiang Lawyers

Tao Jiang Lawyers

Description: Solicitors for the Plaintiffs

Dated: 31 March 2011.

NOTICE AS TO DEFENCE

Your Defence must be attached to your Notice of Intention to Defend.



1. Place of trial – Melbourne
2. Mode of trial – By Single Judge
3. This writ was filed by – **Tao Jiang Lawyers**, Level 1, 580 Barkly Street  
Footscray West VIC 3012
4. The address of the plaintiffs is – 20-24 Guildford Lane, Melbourne Vic 3000
5. The address for service of the plaintiffs is – **Tao Jiang Lawyers**, Level 1, 580 Barkly  
Street, Footscray West VIC 3012
6. The address of the defendants is –



First Defendant:

DEMETRIOS VAKRAS  
[REDACTED] Street  
KENSINGTON VIC 3032

Second Defendant:

LEE-ANNE RAYMOND  
[REDACTED] Street  
KENSINGTON VIC 3032

**SCHEDULE OF PARTIES**

**BETWEEN :**

**ROBERT RAYMOND CRIPPS**

First Plaintiff

**REDLEG MUSEUM SERVICES PTY LTD (ACN : 105 986 829)**

Second Plaintiff

**AND**

**DEMETRIOS VAKRAS**

First Defendant

**LEE-ANNE RAYMOND**

Second Defendant

Dated: 31 March 2011

