

Form 3-9

(Rule 3-9)

COURT FILE NUMBER **KBG-RG-00802-2026**

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE **REGINA**

PLAINTIFF(S) **DR. DAYAN GOODENOWE and LAKEVIEW REGIONAL
WELLNESS CENTRE INC.**

DEFENDANT(S) **CARLA BECK and JARED CLARKE**

NOTICE TO DEFENDANT

1 The plaintiff may enter judgment in accordance with this Statement of Claim or the judgment that may be granted pursuant to *The King's Bench Rules* unless, in accordance with paragraph 2, you:

- (a) serve a Statement of Defence on the plaintiff; and
- (b) file a copy of it in the office of the local registrar of the Court for the judicial centre named above.

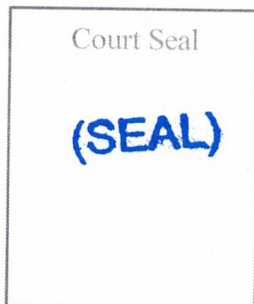
2 The Statement of Defence must be served and filed within the following period of days after you are served with the Statement of Claim (excluding the day of service):

- (a) 20 days if you were served in Saskatchewan;
- (b) 30 days if you were served elsewhere in Canada or in the United States of America;
- (c) 40 days if you were served outside Canada and the United States of America.

3 In many cases a defendant may have the trial of the action held at a judicial centre other than the one at which the Statement of Claim is issued. Every defendant should consult a lawyer as to his or her rights.

4 This Statement of Claim is to be served within 6 months from the date on which it is issued.

5 This Statement of Claim is issued at the above-named judicial centre on the 15th day of April, 2026.



S. SIDDIKA
DR. LOCAL REGISTRAR

D. _____
Local Registrar

STATEMENT OF CLAIM

The Parties

1. The Plaintiff, Dayan Goodenowe (“Dr. Goodenowe”) is an individual residing in the City of Temecula, in the State of California, in the United States of America.
2. The Plaintiff, Lakeview Regional Wellness Centre Inc. (“LRWC”), is a corporation incorporated pursuant to the laws of Saskatchewan. LRWC’s registered office is located in Moose Jaw, Saskatchewan.
3. The Defendant, Carla Beck, is an individual residing in the Province of Saskatchewan. Ms. Beck is the leader of the Saskatchewan New Democratic Party (“NDP”). She is the Member of the Legislative Assembly (“MLA”) for the constituency of Regina Lakeview and the Leader of the official opposition.
4. The Defendant, Jared Clarke, is an individual residing in the Province of Saskatchewan. Mr. Clarke is a senior member of the NDP and reports to Ms. Beck in the NDP shadow cabinet, serving at her direction as the NDP Shadow Minister for Rural and Remote Health. He is the MLA for the constituency of Regina Walsh Acres.

Overview

5. Dr. Goodenowe is a Canadian citizen, born in Moose Jaw, Saskatchewan. Dr. Goodenowe holds a PhD in neurosciences. He is a well-established biochemist, synthetic organic chemist, inventor, and a clinical research expert with decades of experience.
6. Dr. Goodenowe is the principal of LRWC, which he established in Moose Jaw as part of his efforts to better his community. He has built a successful business in the United States and Canada offering advanced education and support for those with amyotrophic lateral sclerosis

(“ALS”) and other illnesses. He is not and has never purported to be a medical doctor, or provide medical treatment.

7. LRWC operates a Restorative Health Center in Moose Jaw, Saskatchewan (the “RHC”). The RHC offers a structured, education and infrastructure-based support program focused on functional individualized health restoration. The support program is a self-directed program that each individual tailors to their own specific needs. The RHC is not, and has never purported to be, a medical centre, or to otherwise provide any medical treatment. Saskatchewan residents are able to access the RHC at no cost. No Saskatchewan resident has paid for the RHC, its services, or the supplements provided at the RHC.

8. As further particularized below, since at least June 2025, the Defendants, Ms. Beck and Mr. Clarke, have acted individually and conspired together to maliciously wage a defamatory campaign against the Plaintiffs, intended to ruin their professional reputation and business. This campaign, waged for personal political gain, has caused the Plaintiffs significant reputational harm and financial losses.

June 2025 – The NDP-led Defamation Campaign Begins

9. The defamatory campaign of the Defendants began in or about June 2025. Mr. Clarke, with the apparent agreement of Ms. Beck, organized a news conference for June 20, 2025 to which they invited numerous members of the news media.

10. At that news conference, Mr. Clarke uttered numerous defamatory words about the Plaintiffs (the “June 20 Press Conference Words Complained Of”) to the assembled news media (the complete identities of which are only known to the Defendants and not the Plaintiffs), including that:

- (a) “A damning CBC investigation found that this facility that opened last July is offering expensive, unproven treatments to people living with neurodegenerative disorders, such as ALS, Parkinson's, MS, and other cognitive disorders like dementia and Alzheimer's”;
- (b) “They are charging up to \$90,000 US for programs based on unapproved supplements and unsupported medical claims. The facility markets itself as offering restorative health services, yet the CBC investigation found that it employs no nurses or doctors. Its founder, Dayan Goodenowe, is not a licensed medical doctor in Canada and is not regulated in any or by any professional body. We're talking about people with an incurable disease who are desperate for hope, being misled with promises that are not backed in any scientific evidence. This is false hope being sold for profit. This is not just unethical, it is dangerous.”
- (c) “This is not a gray area. This is a clear and urgent matter of patient safety. We cannot allow unregulated facilities to target vulnerable people with misleading claims without any oversight or accountability.”

11. The June 20 Press Conference Words Complained Of were uttered about the Plaintiffs and were intended to, and did in fact, communicate false and defamatory meanings that include the following:

- (a) The Plaintiffs are unethical;
- (b) The Plaintiffs are fraudsters;
- (c) The Plaintiffs knowingly mislead members of the public;

- (d) The Plaintiffs intentionally, or recklessly, put the safety of clients at risk;
- (e) The Plaintiffs have committed criminal or regulatory offences that justify an investigation; and
- (f) The Plaintiffs exploit vulnerable members of the public for profit.

12. The Defendant, Mr. Clarke, uttered June 20 Press Conference Words Complained Of with malice, intending that they be re-published generally and re-circulated in the media. They were in fact re-published by news media and otherwise, including in the following publications made to members of the public:

- (a) In a June 20, 2025 online article by John Cairns entitled “NDP, ALS Society want Moose Jaw clinic investigated” and published on SaskToday.ca at the following URL <<https://www.sasktoday.ca/provincial-news/ndp-als-society-want-moose-jaw-clinic-investigated-10841989>> and on MooseJawToday.ca at the following URL <<https://www.moosejawtoday.com/local-news/ndp-als-society-want-moose-jaw-clinic-investigated-10841989>>;
- (b) In a June 20, 2025 online article by Geoff Leo entitled “Sask. NDP and ALS society calling on province to investigate Moose Jaw health centre” and published on CBC.ca at the following URL <<https://www.cbc.ca/news/canada/saskatchewan/goodenowe-als-society-moose-jaw-health-centre-ndp-1.7567311>>;
- (c) In a June 20, 2025 online article by Larissa Kurz entitled “ALS Society of Sask., NDP calling for investigation into Moose Jaw health centre” at the following URL

<<https://leaderpost.com/news/saskatchewan/als-society-of-sask-ndp-calling-for-investigation-into-moose-jaw-health-centre>>

13. As Ms. Beck and Mr. Clarke had apparently planned, Ms. Beck herself endorsed and republished the June 20 Words Complained Of, with malice, on her personal Facebook page at the following URL: <<https://www.facebook.com/CarlaBeckSK/posts/today-the-saskatchewan-ndp-joined-the-als-society-to-call-on-the-sask-party-mini/1101369745145262/>> (the “June 20 Beck Facebook Post”). The June 20 Beck Facebook Post discusses the NDP and ALS Society’s calls for an investigation into Dr. Goodenowe and the RHC, and highlights the reporting undertaken by the CBC into the Plaintiff’s practices and facility. The June 20 Beck Facebook Post made further false and defamatory statements, including that (the “June 20 Beck Words Complained Of”):

- (a) “Today, the Saskatchewan NDP joined the ALS Society to call on the Sask. Party Minister of Health to immediately launch a full investigation into the Dr. Goodenowe Restorative Health Centre in Moose Jaw”
- (b) “A CBC investigation found that the private facility offers expensive unproven treatments to people living with serious neurodegenerative disorders —including ALS, Parkinsons and MS.”
- (c) “It’s charging up to \$90,000 USD for unproven treatments – with no medical license, oversight, or scientific evidence.”
- (d) “These families are desperate for hope – and they’re being misled and exploited. This is a breach of public trust and medical ethics”

- (e) “It’s time for accountability. Saskatchewan patients and families deserve protection — not profit-driven false hope.”

14. The Defendant, Ms. Beck, published the June 20 Beck Words Complained Of about the Plaintiffs with malice and intended to, and did in fact, communicate false and defamatory meanings that include the following:

- (a) Those meanings attributable to the June 20 Words Complained Of, as described above;
- (b) That the Plaintiffs are untrustworthy; and
- (c) That the Plaintiffs are liars and willing to mislead and have in fact misled members of the public and patrons for financial gain.

15. The June 20 Beck Facebook Post reached a wide audience and was reposted by at least 240 individual Facebook users and amplified or reacted to by at least 614 such users, all of which amounted to re-publication and which was the natural and probable consequences of the original publication on Facebook. The full scope of dissemination of the June 20 Beck Facebook Post is unknown, but was likely published to thousands of users, as Ms. Beck intended. The re-publication of the defamatory meaning of the June 20 Beck Facebook Post Words Complained Of was then amplified by comments from at least 204 users, including the following comments about the Plaintiffs (the “June 20 Beck Facebook Comment Words Complained Of”):

- (a) “this is absolutely despicable. Scammers”
- (b) “this needs to be investigated. Criminal and immoral!”

- (c) “there is a special place in hell for someone to take advantage of people with ALS, Parkinson’s and MS and fleecing them out of all this money! This scumbag deserves to rot in jail for the rest of his life and any money that he has should be split amongst all his victims families”
- (d) “the man should be jailed and all of the money returned to the families!”
- (e) “there are always charlatans who will take the last dollar from dying people offering fake cures. I don’t know how they can sleep at night.”

16. Ms. Beck, as the administrator of her personal Facebook page, had knowledge of the June 20 Beck Facebook Comment Words Complained Of and authorized them to be published on her Facebook page.

17. While Ms. Beck and Mr. Clarke may have been immediate publishers or re-publishers of only certain of the June 20 Press Conference Words Complained Of, the June 20 Beck Words Complained Of, the June 20 Beck Facebook Comment Words Complained Of (collectively, the “June 20 Words Complained Of”), they are each liable for the actions of the other in this regard, and for any further republication thereof. All of the June 20 Words Complained Of were published with the knowledge and intention of each of the Defendants, Ms. Beck and Mr. Clarke, and further to the agreement between them to do so.

December 2025 Campaign to Promote Criminal Prosecution

18. The NDP-led campaign to defame the Plaintiffs continued. In or about December 2025, Ms. Beck and Mr. Clarke engaged in sustained efforts to initiate criminal investigation and

prosecution of the Plaintiffs, and publicly promote the false and malicious narrative that they were criminally responsible for the death of an ALS sufferer and patron of the Plaintiffs.

19. On or about December 2, 2025, Mr. Clarke, with the agreement and assistance of Ms. Beck, sent a letter to the Moose Jaw Police Service accusing the Plaintiffs of criminal offences and requesting that the police service launch a criminal investigation into them (the "Police Letter"). Among other things, the Police Letter stated the following (the "Police Letter Words Complained Of"):

- (a) "I write to you today with great concern regarding potential fraud, criminal neglect and a failure to provide the necessities of life by the person running the Dr. Goodenowe Restorative Health Centre in Moose Jaw."
- (b) "My concerns became far more dire after learning of the horrific circumstances involving the lack of care provided to Susie Silvestri by Goodenowe's centre"
- (c) "Given all of this, I respectfully request that you consider opening a criminal investigation into the practices of this centre and specifically those concerning Susie Silvestri. I refer you to specifically to Canadian Criminal Code:
 - (i) Section 215 – concerning the failure to provide necessities to anyone under their charge who is unable to care for themselves due to illness.
 - (ii) Section 216 – concerning duty to have and use reasonable knowledge, skill and care when administering surgical or medical treatment.

- (iii) Section 219 – concerning criminal negligence and the “wanton or reckless disregard for the lives or safety of other persons.”
- (iv) Section 380(1) – concerning anyone who “by deceit, falsehood or other fraudulent means,” defrauds the public or any person of property, money, or services”.
- (d) "Bluntly, I fear for the safety of other patients who may turn to Dr. Goodenowe out of desperation."

20. The Defendant, Mr. Clarke, published the Police Letter Words Complained Of about the Plaintiffs with malice and intended to, and did in fact, communicate false and defamatory meanings that include the following:

- (a) The Plaintiffs are unethical;
- (b) The Plaintiffs are fraudsters;
- (c) The Plaintiffs are criminals;
- (d) The Plaintiffs knowingly mislead members of the public;
- (e) The Plaintiffs intentionally, or recklessly, put the safety of clients at risk;
- (f) The Plaintiffs exploit vulnerable members of the public for profit; and
- (g) The Plaintiffs’ conduct contributed to the death of Susie Silvestri, a patron of the RHC from Montana, USA.

21. On the same day, December 2, 2025, Mr. Clarke himself published an image and the text of the Police Letter to his public Facebook page at the following URL: <https://www.facebook.com/share/p/1CgYxxWbJu/> (the “December 2 Clarke Facebook Post”).

He posted it with the following caption:

- (a) “We're the Wild West when it comes to the regulation of healthcare. We believe, with everything that has been alleged about neglect and complete disregard for Susie Silvestri, that a criminal investigation is warranted. That's why today I sent a letter to the Moose Jaw Police Service requesting a police investigation. We have a Premier who won't step in and take responsibility for the sorry state of healthcare in this province — and we have a Health Minister who will literally run from his responsibilities.” (together with the Police Letter Words Complained Of, the “December 2 Clarke Facebook Post Words Complained Of”).

22. The Defendant, Mr. Clarke, published the December 2 Clarke Facebook Post Words Complained Of about the Plaintiffs with malice and intended to, and did in fact, communicate false and defamatory meanings that include the following:

- (a) Those meanings attributable to the Police Letter Words Complained Of, as described above;
- (b) That the Plaintiffs were negligent in their provision of services to Ms. Silvestri; and
- (c) That the Plaintiffs were negligent in their provision of services to Ms. Silvestri, or disregarded her life or safety and caused her death.

23. The Defendant, Mr. Clarke, uttered the December 2 Clarke Facebook Post Words Complained Of with malice, intending that they be re-published by others on Facebook and otherwise. It was re-published by at least 32 individual Facebook users and amplified or reacted to by at least 91 such users. The full scope of dissemination of the December 2 Clarke Facebook Post is unknown, but was likely published to thousands of users, as Mr. Clarke intended. The re-publication of the defamatory meaning of the December 2 Clarke Facebook Post Words Complained Of was then amplified by comments from at least 7 users, including the following comments about the Plaintiffs (the “December 2 Clarke Facebook Comment Words Complained Of”):

- (a) “This place is fraudulent and promising hope to the hopeless”;
- (b) “Fraud is at a minimum... though involuntary manslaughter should be the real charge”; and
- (c) “What a mess, this guy needs to be branded on his forehead that he’s a f-up”.

24. Mr. Clarke, as the administrator of his personal Facebook page, had knowledge of the December 2 Clarke Facebook Comment Words Complained Of and authorized them to be published on his Facebook page.

25. Also on December 2, 2025, the Police Letter was re-published by Ms. Beck and Mr. Clarke and the Saskatchewan New Democratic Party in a press release posted on the website of the Saskatchewan NDP Caucus at the following URL: https://www.ndpcaucus.sk.ca/as_scott_moe_refuses_to_step_in_saskatchewan_ndp_call_on_police_to_investigate_alleged_horrorfic_care_provided_at_moose_jaw_centre (the “NDP Press

Release”). The NDP Press Release stated the following (the “NDP Press Release Words Complained Of”):

- (a) The Police Letter Words Complained Of.
- (b) “In a formal letter sent Tuesday, Rural & Remote Health Shadow Minister Jared Clarke cited potential fraud, criminal neglect and failure to provide the necessities of life to Susie Silvestri, a former patient at the Dr. Goodenowe Restorative Health Centre in Moose Jaw.”
- (c) “Clarke’s call comes as Premier Scott Moe refused to even rise and answer any questions Monday about the tragedy surrounding the horrible treatment of Silvestri. His Health Minister Jeremy Cockrill dodged repeated calls to investigate the matter during Question Period and then ran away from reporters in the Legislature Rotunda who were demanding answers and accountability over the tragedy.”
- (d) “We have a Premier who won’t step in and take responsibility for the sorry state of healthcare in this province — and we have a Health Minister who will literally run from his responsibilities,” Clarke said. “This isn’t leadership. We’re the Wild West when it comes to the regulation of healthcare and we have a Sask. Party government that, after 18 years, has not only failed to fix healthcare, they’ve clearly stopped even trying.”
- (e) “Silvestri suffered from ALS and journeyed from her home in North Carolina to the Dr. Goodenowe Restorative Health Centre believing she would be cured. The man behind the centre, Dayan Goodenowe, has constantly advertised and touted his

‘success rate’ when it comes to treating ALS. His claims led to previous calls on the Health Minister from the Official Opposition and ALS Society of Saskatchewan to investigate earlier this year.”

- (f) “According to detailed reporting by CBC:
 - (i) Silvestri was 70 years old and dealing with rapidly progressing ALS.
 - (ii) She came to the centre from North Carolina after seeing the public promises made by Dr. Goodenowe who claims a “100 per cent success rate in stopping the progression and in restoring function of people with ALS.”
 - (iii) Silvestri, out of desperation, put her home up for sale to try to raise the \$84,000 USD fee required to receive care at the centre.
 - (iv) A former Goodenowe staff member stated that “It was our impression, I think, that she required a way higher level of care than we were prepared to give based on our training.”
 - (v) The former employee also stated that Silvestri was “under the impression she would leave the building walking in three months.”
 - (vi) Once at the centre, Silvestri was too weak to feed herself and begged for a feeding tube to be inserted. Former employees have alleged that request was refused because her insurance would not pay for the surgery in a Canadian Hospital, and the Moose Jaw Hospital would only do the surgery on a non-Canadian in an emergency situation.

- (vii) Silvestri texted her brother Charles Silvestri at one point, stating she was “nervous and scared,” and “This is not what I ever thought my life would look like at this point.”
 - (viii) Silvestri eventually left the centre in an ambulance she rented for a four-hour drive to Montana, to a hospital that would take her insurance with little help from Goodenowe or his company.
 - (ix) She died in late 2024 at that hospital.”
 - (g) “I believe with everything that has been alleged about neglect and complete disregard for Susie Silvestri that a criminal investigation is warranted,” Clarke said. “It’s clear that Scott Moe and the Sask. Party won’t do a damn thing to deliver accountability for her loved ones or to ensure that something like this never happens again — so we’re stepping in.”
 - (h) “Healthcare here is worse than it’s ever been and the Saskatchewan NDP won’t rest until we deliver the big, bold change needed to end the crisis we see playing out in this province every single day.”
26. The Defendants, Ms. Beck and Mr. Clarke, published the NDP Press Release Words Complained Of about the Plaintiffs with malice and intended to, and did in fact, communicate false and defamatory meanings that include the following:
- (a) Those meanings attributable to the Police Letter Words Complained Of, as described above;

- (b) That the Plaintiffs were negligent in their provision of services to Ms. Silvestri;
- (c) That the Plaintiffs negligence in their provision of services to Ms. Silvestri, or disregarded her life or safety and caused her death.

27. As intended by the Defendants, the Police Letter, the December 2 Clarke Facebook Post, the December 2 Clarke Facebook Comments and the NDP Press Release garnered much media and social media attention, thereby republishing the defamatory meanings attributable to those statements. These included:

- (a) A December 5, 2025 online article authored by Brandon Harder titled “Dayan Goodenowe responds to claims about Moose Jaw health centre, police investigating”, at the following URL: <<https://leaderpost.com/news/dayan-goodenowe-responds-to-claims-about-moose-jaw-clinic-police-investigating>>
- (b) A December 4, 2025 online article authored by Sierra D’Souza Butts titled “Moose Jaw police investigate health centre after concerns about American woman mistreated”, at the following URL: <<https://www.ctvnews.ca/regina/article/moose-jaw-police-investigate-health-centre-after-concerns-about-american-woman-mistreated/>>
- (c) A December 2, 2025 online article authored by Geoff Leo titled “Politicians calling for investigations of controversial Moose Jaw health centre following CBC report”, at the following URL: <<https://www.cbc.ca/news/canada/saskatchewan/goodenowe-center-moose-jaw-health-minister-als-9.7000781>>

- (d) A December 5, 2025 online article by CJME News titled “Health Minister orders investigation into Moose Jaw ALS clinic”, at the following URL:
<<https://www.ckom.com/2025/12/05/health-minister-orders-investigation-into-moose-jaw-als-clinic/>>
- (e) A December 3, 2025 online article authored by Moose Jaw Staff titled “Police examine claims against Moose Jaw health centre as Goodenowe offers detailed response”, at the following URL:
<<https://www.discovermoosejaw.com/articles/police-examine-claims-against-moose-jaw-health-centre-as-goodenowe-offers-detailed-response>>
- (f) A December 3, 2025 online article authored by John Cairns titled “Dr. Goodenowe facility under scrutiny again after former client dies”, at the following URL:
<<https://www.sasktoday.ca/provincial-news/dr-goodenowe-facility-under-scrutiny-again-after-former-client-dies-11565166>>

28. Mr. Clarke himself maliciously undertook efforts to amplify the Police Letter Words Complained Of, the December 2 Clarke Facebook Post Words Complained Of, the December 2 Clarke Facebook Comment Words Complained Of and the NDP Press Release Words Complained Of, including by bringing those words to the attention of news media and offering further defamatory comments which compounded the harm. These statements included the following (the “December 2025 Clarke Spoken Words Complained Of”):

- (a) As republished in a story posted on SaskToday.com on or about December 3, 2025, at the following URL <<https://www.sasktoday.ca/provincial-news/dr-goodenowe-facility-under-scrutiny-again-after-former-client-dies-11565166>> under the

headline “Dr. Goodenowe facility under scrutiny again after former client dies”, Mr. Clarke stated the following on or about that date: “[Susie Silvestri] came to Moose Jaw to the Dr. Goodenowe health centre looking for care, looking for health care. She died. ... This is not health care, this is inhumane.”

- (b) As republished in a story posted on MooseJawToday.com on or about December 3, 2025, at the following URL <https://www.moosejawtoday.com/provincial-news/dr-goodenowe-facility-under-scrutiny-again-after-former-client-dies-11565166#:~:text=%22There%20is%20'health%20center'%20on,is%20saying%20there's%20nothing%20he>> under the headline “Dr. Goodenowe facility under scrutiny again after former client dies”, Mr. Clarke stated the following on or about that date: “There is ‘health centre’ on the building, that’s what they’re claiming this is, health care. And yet the minister is saying that there’s nothing he can do.”

29. The Defendant, Mr. Clarke, published The Additional December 2025 Words Complained Of about the Plaintiffs with malice and intended to, and did in fact, communicate false and defamatory meanings that include the following:

- (a) The Plaintiffs are responsible for the death of Ms. Silvestri; and
- (b) The Plaintiffs mislead patrons and members of the public into believing that they provide licensed healthcare and that Dr. Goodenowe is a licensed medical doctor.

30. In furtherance of their campaign of defamation against the Plaintiffs, Ms. Beck promoted the Police Letter Words Complained Of to members of the news media and the public on her Facebook page on December 2, 2025 at the following URL:

<<https://www.facebook.com/CarlaBeckSK/posts/we-have-a-premier-who-wont-step-in-and-take-responsibility-for-the-sorry-state-o/1229838435631725/>>

31. In particular, on or about December 2, 2025, Ms. Beck published the following words in a post at that URL (the “December 2 Beck Facebook Post”):

- (a) “We have a Premier who won’t step in and take responsibility for the sorry state of healthcare in this province — and we have a Health Minister who will literally run from reporters when asked to be accountable.”
- (b) “We believe that, with everything that has been alleged about neglect and complete disregard for Susie Silvestri, that a criminal investigation is warranted.”
- (c) “It’s clear that Scott Moe and the Sask. Party won’t do a damn thing to deliver accountability for her loved ones or to ensure that something like this never happens again — so we’re stepping in.”

32. Also on or about December 2, 2025, Ms. Beck adopted and republished, by means of publication of a 2:08 long clip, portions of a statement made by Mr. Clarke in the Legislative Assembly of Saskatchewan on December 1, 2025 (the “December 1 Clarke Speech”), on Facebook at the following URL: <<https://www.facebook.com/reel/1386672683094711>>. The December 1 Clarke Speech included the following false and defamatory statements:

- (a) “Mr. Speaker. Susie Silvestri could no longer speak or walk, and hadn’t eaten for days. She was starving to death and begging for a feeding tube. But the Dr. Goodenowe Restorative Health Center in Moose Jaw, where Ms. Silvestri was

staying, wouldn't do it. She died alone, scared. She texted her brother and said, "This is not what I ever thought my life would look like at this point.""

- (b) "Dr. Goodenowe claims to have a 100 per cent success rate when it comes to treating ALS [amyotrophic lateral sclerosis] patients, yet Ms. Silvestri died."
- (c) "Her brother said, "I think they just robbed her." And the ministry won't do a thing. This is a private, unregulated facility in Moose Jaw. Former Saskatchewan deputy minister of Health Dan Florizone says, Saskatchewan is the wild west when it comes to health care oversight."
- (d) "Ms. Silvestri died, Mr. Speaker. She was so desperate that she put her house up for sale to try and pay Dr. Goodenowe because he refused to treat her until she paid. This is Saskatchewan, the birthplace of medicare. And we brought forward these concerns back in June, and the minister did nothing."
- (e) "Ms. Silvestri's death is an absolute horrific tragedy. If the minister won't investigate this tragedy or take the steps to ensure it never happens again, will the Premier?"

33. Ms. Beck's republication of the December 1 Clarke Speech also added a caption authored by Ms. Beck (the "December 2025 Beck Facebook Reel Caption"), which stated the following (taken together with the December 1 Clarke Speech, the "December 2025 Beck Facebook Reel"):

- (a) "Susie Silvestri could no longer speak or walk and hadn't eaten for days. She was begging for a feeding tube. The so-called Dr. Goodenowe Restorative Health Centre in Moose Jaw where she was staying wouldn't do it. Out of desperation and

to cover the \$84,000 USD fee to receive care, Silvestri put her house up for sale. Eventually, Silvestri rented an ambulance and left the centre for a hospital in Montana. She died there, alone and scared. This is a horrific tragedy. It warrants a full investigation from Scott Moe and his Minister of Health. We have to do something to ensure this never, ever happens again.”

- (b) “We believe that, with everything that has been alleged about neglect and complete disregard for Susie Silvestri, that a criminal investigation is warranted.”

34. Together, the December 2 Beck Facebook Post, and the December 2025 Beck Facebook Reel (taken together, the “December 2025 Beck Words Complained Of”) were published by the Defendants about the Plaintiffs with malice and intended to, and did in fact, communicate false and defamatory meanings that include the following:

- (a) Those meanings attributable to the Police Letter Words Complained Of, as described above;
- (b) That the Plaintiffs were negligent in their provision of services to Ms. Silvestri;
- (c) That the Plaintiffs negligence in their provision of services to Ms. Silvestri, or disregarded her life or safety and caused her death;
- (d) That the Plaintiffs “robbed” Ms. Silvestri; and
- (e) That the Plaintiffs have misled their clients.

Defamation

35. The defamatory statements outlined above, namely the June 20 Words Complained Of, the Police Letter Words Complained Of, the December 2 Facebook Post Words Complained Of, the NDP Press Release Words Complained Of, the December 2 Facebook Comment Words Complained Of, the Additional December 2025 Words Complained Of, and the December 2025 Beck Words Complained Of (collectively, the “Words Complained Of”):

- (a) referred directly to the Plaintiffs, or reasonably could be inferred by members of the community to be in reference to the Plaintiffs;
- (b) were published by the Defendants, acting in furtherance of an agreement between them to defame the Plaintiffs;
- (c) were published to members of the public, the news media or other third parties, as described above; and
- (d) were intended by the Defendants to defame and did, in fact, defame the Plaintiffs by lowering their personal and professional reputation.

36. In their plain and ordinary meaning, and by implication, innuendo, and in their context and circumstances, the Words Complained Of are false, malicious, and defamatory, as described above.

37. The Defendants each acted with malice when they published or uttered the Words Complained Of. They were each aware, ought to have been aware, or could have become aware with reasonable investigation that the statements and the meaning conveyed by the Words

Complained Of were false, and if publicized and repeated, would be severely damaging to the Plaintiffs in their personal and professional capacity.

38. The Plaintiffs rely not only on the malice implied by the Words Complained Of, but also expressly plead that the Words Complained Of were actuated by malice having regard to the following:

- (a) The apparent motives of the Defendants were for personal political advantage;
- (b) The Defendants agreed with one another on one or more occasions to coordinate their actions, including to amplify and re-publish the reach of their defamatory smears;
- (c) The Defendants undertook no efforts to verify the truth or accuracy of the Words Complained Of;
- (d) The Defendants did not communicate with the Plaintiffs or their representatives in any way for the purpose of verifying the accuracy of any of the Words Complained Of, or obtaining any response or perspective from the Plaintiff to the false and defamatory allegations at issue; and
- (e) The Defendants did not otherwise make any effort to publish or otherwise present the responses of the Plaintiffs to the false and defamatory allegations.

False Light

39. Taken together, the Words Complained Of have created a narrative that has portrayed the Plaintiffs in a false light, which includes, but is not limited to, the following elements:

- (a) Dr. Goodenowe and the RHC are running a fraudulent operation;
 - (b) Dr. Goodenowe and the RHC are criminally negligent in their care of patrons at the RHC;
 - (c) Dr. Goodenowe and the RHC fail to provide the necessities of life to their patrons;
 - (d) Dr. Goodenowe and the RHC are responsible for the death of Ms. Silvestri;
 - (e) Dr. Goodenowe and the RHC are taking advantage of a vulnerable population to make a profit;
 - (f) Dr. Goodenowe is a thief and a charlatan;
 - (g) The RHC is operating with no oversight or regulation;
 - (h) Dr. Goodenowe and the RHC are dangerous to those with ALS; and
 - (i) Dr. Goodenowe and the RHC should be investigated for several alleged breaches of the criminal code.
40. By creating and disseminating this narrative, the Defendants have committed the false light tort.
41. That false light in which the Plaintiffs have been placed would be highly offensive to a reasonable person, and the Defendants have intentionally spread this false narrative or been reckless as to the falseness of it. Their negligence includes, but is not limited to:
- (a) Basing their allegations of criminal liability on CBC news reporting which has been perpetually disputed by Dr. Goodenowe;

- (b) Failing to conduct independent investigations into the stories in which they have spoken about;
- (c) Failing to correct or otherwise disavow statements made by others in response to their defamatory comments regarding the Plaintiffs; and
- (d) A failure to contact Dr. Goodenowe to learn information about the RHC directly from him before making their statements.

Damages

42. The Defendants' defamation and casting of the Plaintiffs in a false light, as particularized above, have caused considerable damage to the Plaintiffs. The Plaintiffs are, as a result, entitled to damages.

43. As a result of the conduct complained of, the Plaintiffs have suffered and continue to suffer serious reputational and financial losses in Saskatchewan, across Canada and in the United States.

Aggravated and Punitive Damages

44. The Plaintiffs are entitled to aggravated and punitive damages from the Defendants. The Defendants' conduct was callous, insulting, high-handed, spiteful, and malicious, all of which have increased or otherwise led to the amplification of the Plaintiffs' damages. As such, the Plaintiffs are entitled to aggravated damages from the Defendants' jointly and severally.

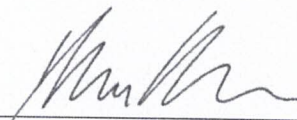
45. The conduct of the Defendants' was a marked departure from the ordinary standards of decent behaviour, and should shock the consciousness of this Honourable Court. The Plaintiffs plead this such conduct demands denunciation, retribution, and deterrence, and warrants an award for punitive damages.

Relief Sought

46. The Plaintiffs claim against the Defendants, jointly and severally:
- (a) General damages for defamation in an amount to be assessed at trial;
 - (b) Special damages in an amount to be assessed at trial;
 - (c) Aggravated damages in an amount to be assessed at trial;
 - (d) Punitive damages in an amount to be assessed at trial;
 - (e) An interim, interlocutory, and permanent injunction restraining and preventing the Defendants from making, publishing, speaking, communicating, or causing to be made, published, communicated, or otherwise disseminated, any malicious, defamatory, fake or false statements or expressions about the Plaintiffs on any website, social media platform, or in any manner whatsoever;
 - (f) An interim, interlocutory, and permanent injunction requiring the Defendants to remove the defamatory comments and posts made about the Plaintiffs on social media;
 - (g) An interim, interlocutory, and permanent injunction requiring the Defendants to publicly retract their defamatory statements, through a method to be determined prior to trial;
 - (h) Pre-judgment interest in accordance with section 5 of the *Pre-Judgment Interest Act*, SS 1984-85-86, c P-22.2;
 - (i) Costs of this action on a solicitor-client basis; and

- (j) Such further and other relief as counsel may advise and this Honourable Court may allow.

DATED at Toronto, Ontario, this 15th day of April, 2026.



Lenczner Slaght LLP
Lawyers for the Plaintiffs, Dayan Goodenowe and Lakeview
Regional Wellness Centre Inc.

CONTACT INFORMATION AND ADDRESS FOR SERVICE

If prepared by a lawyer for the party:

Name of firm:	Lenczner Slaght LLP
Name of lawyer in charge of file:	Brian Kolenda
Address of legal firms:	130 Adelaide St W #2600, Toronto, ON M5H 3P5
Telephone number:	(416) 865-9500
E-mail address:	Bkolenda@litigate.com