

- (b) Second, to **distract** attention from the deteriorating financial performance, overvalued assets, material non-disclosures and misrepresentations to investors of Catalyst, Callidus and their principals; and
- (c) Third, to intimidate West Face, Boland, other capital market participants, regulators and members of the media, in an effort to dissuade or discourage them from scrutinizing, discussing, criticizing or commenting publicly on the deteriorating financial performance, overvalued assets, material non-disclosures and misrepresentations of Catalyst, Callidus and their principals.