

**IN THE MATTER OF** the *Libel and Slander Act*, R.S.O. 1990, c. L. 12;

**AND IN THE MATTER OF** Tele-Connect Publications Ltd. c.o.b  
Kinsman Robinson Galleries, Donald Robinson and Paul Robinson

**TO:** **UGO MATULIC**  
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### **NOTICE OF LIBEL**

**TAKE NOTICE THAT** Kinsman Robinson Galleries, Donald Robinson and Paul Robinson (collectively, the “Complainants”) complain of and object to the words set out in Schedule A hereto published by the Norval Morrisseau Blog (the “Blog”), on the Blog’s website, <<http://norvalmorrisseau.blogspot.com>>, on March 2, May 12, November 28, December 7, and December 13, 2009, and January 19, April 16, July 4, November 4, November 8, and November 10, 2010, being words and statements false and defamatory of and concerning the Complainants and their business.

The words published on the Blog on the dates set out above are defamatory of and concerning the Complainants and their business in their plain and ordinary meaning. In addition, the words mean or are understood to mean that the Complainants are involved in a conspiracy to deceive the public, including existing and potential clients, for their own financial benefit, by de-legitimizing and discrediting authentic Norval Morrisseau works and by illegally selling works of other artists as those of Norval Morrisseau.

The words contained in the Blog are furthermore defamatory insofar as the words mean or are understood to mean that the Complainants are involved in criminal and fraudulent acts. The Complainants have engaged in no such conduct and these meanings are false and injurious to the Complainants and their business.

The Complainants require that you (i) immediately cease publication, broadcast or other repetition of the words complained of, or words of like or similar effect, verbally or in any written form (including removal from any websites or published materials); and (ii) clearly and unreservedly issue a retraction and an apology on the Blog in respect of the defamatory statements and allegations complained of herein in a fashion that is at least as prominent as the original articles that appeared on the Blog.

The Complainants intend to commence an action against you in respect of the words complained of and reserve all rights in that regard including a claim for general, special, punitive, aggravated and exemplary damages. Any further defamation of the Complainants or any further publication, broadcast or repetition of the words complained of will be relied on as evidence of further malice by you towards the Complainants.

Date: December 23, 2010

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## Schedule A – Defamatory Words

### Weekend of Awakening (March 2, 2009)

This weekend has been dedicated to the presentation of additional information that focused on the ‘Norval Morrisseau Conspiracy’. This conspiracy involves a couple of galleries (Kinsman Robinson Galleries...) and a few individuals who were closely associated with the artist namely Don Robinson of the Kinsman Robinson Galleries...

From the very beginning of the NORVAL MORRISSEAU BLOG I felt the need to create a platform that will speak for Norval when this privilege [*sic*] to speak for himself was put in the hands of others that were only interested in their personal financial gain by putting the Legacy of Norval Morrisseau aside.

#### **Comments:**

It is undeniable that they obviously have their own agenda...

I bet this will be a bad year from KRG. One can hope and dream...

This is a really great showing of evidence towards KRG and Gabe...

To Mr. Don Robinson – let’s get to the point. I think someone is scared and is standing on their last leg. You have been nothing but a problem since day one to the Norval Morrisseau legacy and to this blog. Last thought, thank God that Norval finally got away from Gabe and Don and the others that only thought about themselves...

... It always seemed funny to me that all you galleries have made huge figures and have cushy lifestyles thanks to Mr. Morrisseau, yet, at Red Lake Woodland Arts Festival that was a tribute to Norval Morrisseau and Woodland Artists ... Kinsman Robinson Galleries have not contributed [*sic*] a penny [*sic*] for Norval’s Gravestone? He was homeless most of his life and poor, while you gallery owners lived a large life...

All the conspirators now have shame on their faces...

... Its nice to see a blog that is only into showing facts lie a court room and not lies and deception...

In the past I have purchased from KRG Gallery but after seeing all the evidence here this past weekend I will never deal with this Gallery again. Im worried that they could have been selling paintings of questionable authenticity...

... Can you tell us Don again how you are not in this for the profit. I bet you increased the prices of all your paintings so you can purchase a grave stone for Norval!

... So let me get this straight Don Robinson. Christian Morrisseau says his father signed false COA's.

That means then that KRG's certificates of authenticity could be fake too? So we really can't trust any of KRG's paintings due to the fact they might be fake and just had Norval sign off on them to make a sale? I have a hard time believing that out of all the times Christian met people that wanted his Dad to authenticate something, that he can recall such a vivid conversation that happened in the early 90's. That's amazing.

The story of Christian Morrisseau saying that his father signed fake coa's is all part of this 'conspiracy' that has now been opened up to the public...

I am convinced that with all the factual evidence that spirit Walker has presented on this blog since November 2007 to date is more than enough evidence to prove that the safest period of art to buy from Norval Morrisseau would have to be from the 1970's!!! Isn't that an ironic twist of fate?!!!...

... So what have you people gotten for your reward?

... Well Kinsman Robinson Galleries your reputation has now been destroyed and no one wants to buy from you either. I can see a 'For Lease Sign' in your window at 108 Cumberland Street Toronto "please inquire within".

#### **Action of Deception by KRG (Part I) (May 12, 2009)**

The following statement is from KRG's blog dated August, 10th, 2008. This proves their many years of deception which started with a 'National Post' article: "Morrisseau fakes alleged" dated May 18th, 2001 launched by Donald Robinson of the Kinsman Robinson Galleries in his efforts to corner the Norval Morrisseau Art Market through slander and smear campaigns...

#### **Action of Deception by KRG (Part II) (November 28, 2009)**

The following statement is from KRG's blog dated August, 10th, 2008. This proves their many years of deception which started with a 'National Post' article: "Morrisseau fakes alleged" dated May 18th, 2001 launched by Donald Robinson of the Kinsman Robinson Galleries in his efforts to corner the Norval Morrisseau Art Market through slander and smear campaigns...

#### **Action of Deception by KRG (Part III) (December 7, 2009)**

Donald Robinson of Kinsman Robinson Galleries in his blog's post 'Fighting smears: Auction canvases'... extended his knowledge of Norval Morrisseau's art to that of an expert...

The above presented painting "Devouring Watercat", 1970 was sold at 'LEVIS Auctions' (Calgary, Alberta) on April 18th, 2004, came with a provenance traceable back to Kinsman Robinson Galleries (see image below) which directly contradicts their assertions. This ideal that Norval rarely if ever signed the back of his painting is clearly intended to cause confusion in the marketplace. This contention with respect to the work of Norval Morrisseau is completely false, misleading and clearly wrong...

**Deceptions of the main 'Norval Morrisseau Conspirators': Gabor Vada, Bryant Ross, Donald Robinson & Ritchie 'Stardreamer' Sinclair (Part I) (December 13, 2009)**

The captures of my findings and painting presented above proves one thing only. That the above individuals [Robinson] were well aware of their 'hypocritical and lying past activities' in attempts to cover up their scheme of 'Norval Morrisseau' Art Market Devaluation Attack' by trying to convince the public that the artist never signed backs of his paintings with black paint as many painting presented on this blog. Norval Morrisseau actually signed, dated and titled the above painting with black paint... while depicting Don Robinson of Kinsman Robinson Galleries as a 'Trickster'. Isn't it ironic... don't you think???

... The reasons why I started this blog more than two years ago was due to false statements made by Kinsman Robinson Galleries...and individuals\* (a List of Individuals presented at the end of this paragraph) closely associated with Norval Morrisseau regarding paintings in question...

\* - Donald (Don) Robinson of the Kinsman Robinson Galleries.

**Comments:**

This is just further proof as to how stupid Richie and Robinson are. After insisting and suggesting Norval never signed the back of his painting we have even more proof... And still according to these jackasses Norval never signed the back of his paintings.

**Who is Paul C.H. Robinson and what is his role in the Norval Morrisseau Conspiracy? (Part I) (January 19, 2010)**

Donald Robinson\* has sold over fifty paintings that once belonged to me [David Voss]. He did not sell them for me but for other collectors whom I did business with. He took 25 to 30 per cent for the resale of these pieces and I was told they sold for seven to eight thousand each. Not wanting to cause any animosity between these collectors and myself I did not contact Mr. Robinson to utilize as an outlet for sale. The collectors friendships are more important to me than selling some art so I sent to Randy Potter paintings by mostly Norval Morrisseau to sell then at auction. It was shortly after this that I had my first contact with Mr. Robinson. He told me to leave the auction house and to do business with only him and he could make me more money. Normally I have taken his offer but it was the way he said it, more like a threat than an offer. I told him I wanted nothing to do with him and that in the future it would be better not to use threats to begin a business relationship. He has tried several times since then to contact me. The paintings are real and the tactics he used are low down if not dirty. A collector friend of mine has been sending pictures to Norval Morrisseau and getting them authenticated, these were once in my collection...

I am frustrated to say the least, that people like Donald Robinson have such control over the market that he does what he wants and does not care who he hurts or what damage he does...

**Action of Deception by KRG (Part V) (April 16, 2010)**

This proves their [KRG] many years of deception which started with a 'National Post' article: "Morrisseau fakes alleged" dated May 18th, 2001 launched by the Kinsman Robinson Galleries

in their efforts to corner the Norval Morriseau Art Market through slander and smear campaigns...

More information about KRG's deceitful [*sic*] nature, including Blogger & Twitter activities, will be presented soon!

### **Action of Deception by KRG (Part VII) (July 4, 2010)**

It is ironic that one of these 1970's they would label as 'fake' have a provenance leading to their gallery... and they even tried to deceive the public by fabricating the provenance to one of their Morriseau paintings... Also, Mr. Robinson purchased many of these 1970's paintings at Kahn Auctions... It is funny that this same auction house where Mr. Robinson purchased his Morriseaus now calling them 'fakes' were appraised and authenticated by his own gallery as being authentic.

...It is a shame that gallery [KRG] claims to be a 'Norval Morriseau principal dealer' treats disrespectfully paintings that they do not own and glorify the artworks on their gallery's 'Morriseau inventory list' rather than treating every Norval Morriseau artwork with the same respect. It is obvious that their agenda is to 'what benefits them' and not 'what would the general public be able to benefit from'...

...The reason why I started this blog more than two years ago was due to false statements made by Kinsman Robinson... & Gallery and individuals\* (a List of Individuals presented at the end of this paragraph)... I felt the need to create a platform that will speak for Norval when this privilege [*sic*] to speak for himself was put in the hands of others that were only interested in their personal financial gain...

\*Donald (Don) Robinson of the Kinsman Robinson Galleries

### **Norval Morriseau Conspiracy Unveiled (November 4, 2010)**

Mr. Robinson's peculiar behaviour will be highlighted here... with new supporting evidence that has come to light. As stated in Exhibit 4 we have shown clearly that Mr. Robinson had purchased 28 genuine Norval Morriseau paintings at Kahn's Auctions with the original receipts. As stated before Donald C. Robinson was responsible 14 months later on May 18th, 2001 for launching a slander market espionage attack article that would appear in the National Post newspaper. In this newspaper article we have a Donald C. Robinson attacking the auctioneer Mr. Randy Potter and the paintings at this auction for being forgeries which Donald C. Robinson gladly and feverishly purchased. We have made it clear that Mr. Robinson never tried to ask for a refund of the 28 paintings of said 28 artworks from the auctioneer Mr. Randy Potter? However, a refund of \$250.00 + GST totalling \$267.50 was made by Mr. Potter to Donald C. Robinson in regards to a "Robert Davidson" painting dated 1975...

This unbelievable and stranger behaviour that we have exposed here is in regards to the fact that Donald C. Robinson of Kinsman Robinson Galleries requested a refund on a lesser painting supposedly done by Robert Davidson... but allowed himself to incur a loss of \$3,238.73 including GST from the purchases of 28 genuine Norval Morriseau paintings. Which he would slander and defame 14 months later in a National Post Newspaper article... as being all fake

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