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# TAO JIANG LAWYERS

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15 March 2011

Our ref: R.Cripps032011  
Your ref:

Ms L Raymond

[REDACTED]  
[REDACTED] VIC 3031

*By email: leeanneart@iinet.net.au*

*Original by Express Post Platinum*

Dear Ms. Raymond,

**RE: ROBERT CRIPPS & REGLEG-V-YOURSELF: Publication of Articles on the website**

We act for Robert Cripps and his company Redleg Museum Services Pty Ltd.

We are instructed that, on or about June 2009, you and or your agents, published on your Website articles entitled "Review of Guildford Lane Gallery-NEW" [**the article**].

**The article** is found at <http://www.leeanneart.com/guildfordlanegallery.html>, identifying and making direct and indirect remarks about our clients.

The comments and statements made by you in relation to our clients in **the article**, such as, but not limited to:

1. 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... ..;

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2. 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.....;
3. 26th May 2010 An artist reports her reputation and exhibition were "destroyed" by Robert Cripps and his bizarre unchecked antics.....;
4. 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.....;
5. 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.....;
6. 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.....;

7. 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.....;
8. 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.....;
9. 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.....;
10. 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.....;
11. 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

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at Guildford Lane Gallery.....;

12. Cripps though only cared about criticisms of Islam, not Christianity, Hinduism, Zoroastrianism or Judaism. The content, it was claimed, was racist towards Islam alone.....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).  
.....;
13. 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 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.....;
14. 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.....;

Are clearly designed to adversely affect and damage our clients' reputation and good standing, and to their reputation in their business.

On our instructions, this publication (**the article**) is **defamatory**, in that:

1. The article, when read by an ordinary reasonable member of the community, conveys to them certain imputations or messages about our client and his character, whether through the use of specific words and or innuendos;
2. Satisfies one of the three branches of the common law test, in that the imputation carries a defamatory meaning;
3. The article is referable to our client, the clearest example being that the material identifies our client by name;
4. The article was published (in a public forum) and accessible to the public at large;

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and

5. The article was defamatory of our client in his professional capacity.

On our instructions, this publication (**the article**) also gives rise to a separate cause of action in **Injurious Falsehood** against you, in that

1. The statements are false;
2. and the words are maliciously published, they are calculated in the ordinary course of things to produce, and they do produce actual damage to our clients.

Consequently, our clients require:

1. That the defamatory and false article (**the article**) be removed by you and or your agent **within 1 day** from the date of this letter;
2. That the defamatory and false article not be published again;
3. That a written (public) apology and/or correction be published on your website **within 3 days** from the date of this letter; and that
4. You henceforth cease to engage in any further defamation and false publication in relation to our clients.

Please be advised that our clients reserves all of their rights to commence legal proceedings against you in relation to your conduct and to seek damages for the publication, seeks damages for general business losses, and further seek that you pay the legal costs of any such legal proceedings.

If legal proceedings are necessary, then our clients will produce a copy of this letter to the Court on the question of costs and as evidence generally.

We put you on notice that we have firm instructions from our clients that if the defamatory and false article is not removed by you and or your agent **within 1 day** from the date of this letter; and if that a written (public) apology and/or correction is not published on your website

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within **3 days** from the date of this letter; we will commence legal proceedings against you on behalf of our clients without further notice.

We will vigorously seeking damages, including exemplary and aggravated damages, various orders and a declaration, and interest, including compound interest, for defamation and injurious falsehood.

Should you have any queries please contact Ms Tao Jiang of our office on 1300 565 388.

Yours faithfully,  
**TAO JIANG LAWYERS**



**TAO JIANG**