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7 *Attorneys for Plaintiff Camille Herron*

8 SUPERIOR COURT OF ARIZONA  
9 COUNTY OF PIMA

10 Camille Herron, a married woman,  
11 Plaintiff,

12 v.

13 Grippped Publishing, Inc., d/b/a Canadian  
14 Running Magazine, a Canadian  
15 corporation,

16 Defendant.

Case No. \_\_\_\_\_

**COMPLAINT**

17 For her Complaint against Grippped Publishing, Inc., d/b/a Canadian Running, Plaintiff  
18 Camille Herron alleges as follows:

19 **PARTIES, VENUE & JURISDICTION**

- 20 1. Camille Herron (“Camille) is, and at all relevant times was, an adult individual
- 21 residing in Pima County, Arizona.
- 22 2. Camille coordinates and oversees her ultrarunning career from Arizona.
- 23 3. Defendant Grippped Publishing, Inc., d/b/a Canadian Running Magazine
- 24 (“Canadian Running”), is a Canadian corporation.
- 25 4. Canadian Running purposefully directed its activities to Arizona by, among other
- 26 things, directly reaching out to Camille, an Arizona resident, for her assistance in preparing
- 27 an article to be published about Camille and her ultrarunning career, an act which Canadian

1 Running has done many times given the prominence Camille has in the ultrarunning  
2 community.

3 5. Jurisdiction and venue are proper in this Court.

4 6. This case should be considered a “Tier 3” case for purposes of discovery.

5 7. Camille demands a jury trial on all claims.

6 **GENERAL ALLEGATIONS**

7 8. Camille is a highly accomplished professional ultrarunner athlete and multiple-  
8 time world champion and world-record holder and is one of the top athletes in the field of  
9 ultrarunning.

10 9. Camille was inducted into the 2024 Road Runners Club of America Distance  
11 Running Hall of Fame for her longtime contributions to the sport.

12 10. Camille’s husband, Conor Holt (“Conor”), is her coach/manager and is  
13 responsible, *inter alia*, for monitoring and updating a Wikipedia page addressing her  
14 ultrarunning career and other business/email accounts due to difficulties Camille has when it  
15 comes to communicating effectively, especially under stressful situations and circumstances.

16 11. Conor has been managing Camille’s ultrarunning career since 2016, which has  
17 helped shield Camille from bullying and harassment that materially and directly affects her  
18 mental health.

19 12. Between 2016 and 2022, Camille experienced numerous incidents of harassment,  
20 false accusations, exclusion, and attempts to diminish her professional ultrarunning  
21 achievements – *i.e.*, bullying.

22 13. Defendant Canadian Running is an online magazine publishing information about  
23 the sport of running, including ultrarunning athletes like Camille.

24 14. Canadian Running has published many articles about Camille and her highly  
25 successful ultrarunning career and routinely reaches out to Camille in Arizona to get  
26 comments and other related information from Camille for its articles.

27

28

**AuDHD (Autism and ADHD) Materially Affects Camille’s  
Communications, Actions and Sense of Justice**

15. Camille was diagnosed with AuDHD in May 2024.

16. Camille spoke openly in the media and on social posts about being AuDHD starting in June 2024.

17. Autism is a neurobiological developmental disorder that affects communication, behavior, and social interaction that is often characterized by impairments in social communication and social interaction as well as the presence of restricted or repetitive behaviors and an insistence on sameness, inflexible adherence to routines, or ritualized patterns or verbal nonverbal behavior that can manifests as an intolerance for rule infraction or inconsistency and a high level of justice sensitivity, which can lead to a drive to correct unfairness.

18. ADHD (attention-deficit/Hyperactivity Disorder) is a neurodevelopmental developmental disorder characterized by persistent patterns of inattention, hyperactivity, and impulsivity that affects daily functioning and development.

19. AuDHD occurs when an individual, such as Camille, has both autism and ADHD, which results in a unique set of behaviors that differ from someone with just autism or just ADHD alone, which can be challenging for the individual and those around them to understand.

20. Because of the different developmental conditions of AuDHD, Camille’s communication style centers around unwavering integrity, bluntness, honesty and matter of factness, and she has a deep drive to uphold the concepts of fairness and justice and seeks to ensure compliance with rules, regulations and procedures with fairness and integrity being her guide throughout her entire life.

21. Camille’s AuDHD causes her to struggle with behavioral rigidity and compulsivity needing certain things to be done in a certain way and needing to “fix” things that are done incorrectly, this includes a rigid approach to rule compliance and an acute sensitivity to justice.

1           22. Autistic individuals, including Camille, find one on one communication with  
2 people to be challenging. It takes significant energy, time and stress for Camille to engage in  
3 both verbal and written acts of communication.

4           23. Autism and ADHD are legally and medically recognized disabilities.

5           24. Camille, like many people with autism, has been bullied throughout her life  
6 because of the different traits she exhibits; as an athlete with AuDHD, Camille has been and  
7 continues to be bullied in the ultrarunner community, including specifically by other  
8 ultrarunner athletes and various governing organizations.

9           25. The tone and/or delivery of communications from someone like Camille with  
10 AuDHD is often straightforward or monotone, which is often misinterpreted for bluntness or  
11 rudeness by neurotypical individuals.

12           26. Because Camille communicates differently than most people, it is common for  
13 neurotypical people to read things into her communications that are not there and that Camille  
14 did not intend.

15           27. While people with AuDHD, including Camille, pose direct and/or persistent  
16 questions for the genuine purpose of seeking clarification, it is common for neurotypical  
17 individuals to interpret these communications as an act of challenging someone's knowledge  
18 or authority when no such challenge was intended.

19           28. Autism, ADHD and AuDHD are chronic and stable lifelong conditions with  
20 behavioral patterns that occur throughout the individual's life and across multiple settings.

21  
22                           **Camille's AuDHD Hyper-Focus is Manifested in Her Need  
23                           for Rule Adherence in the Ultrarunning Community**

24           29. There are several governing bodies that oversee and supervise the ultrarunning  
25 community, including by ensuring races are properly operated and run fairly including World  
26 Athletics, Association of Canadian of Ultramarathoners ("ACU"), USA Track & Field  
27 ("USATF"), International Association of Ultrarunners ("IAU"), Athletics Canada (AC), and  
28 AC and USATF SafeSport.

1           30. World Athletics is an international governing body for the sport of athletics, which  
2 includes ultrarunning; its main mission is to govern, evolve and promote athletics globally  
3 and ensure fair competition and cooperation among its members.

4           31. The ACU serves as the Canadian representative organization to the IAU and  
5 advocates for the interest of the Canadian ultramarathon community.

6           32. The USATF is a United States national governing body for the sports of track and  
7 field, cross country running, road running, Mountain/Ultra/Trail, and racewalking (known as  
8 the sport of athletics outside the US).

9           33. Camille served 12 years as the Secretary of the USATF Women’s LDR  
10 Committee.

11           34. In 2021, Camille was voted as the USATF Marja Bakker Women’s LDR  
12 Contributor of the Year.

13           35. Athletics Canada is a national governing body for athletics in Canada  
14 encompassing track and field, para-athletics, cross-county running, and road running. Its  
15 mission is to support high performance athletics.

16           36. SafeSport is an initiative designed to promote safety, respect, and integrity in  
17 sports by preventing abuse, harassment, and misconduct.

18           37. Despite the various governing bodies responsible for overseeing ultrarunning  
19 events and athletes, many ultrarunning events, organizations and participants remain  
20 unsanctioned and unaffiliated with USATF, World Athletics, IAU, Athletics Integrity Unit  
21 (AIU), Safe Sport, or other national federations, resulting in limited accountability and  
22 oversight.

23           38. While not a governing body but often publicly representing itself to be one,  
24 Global Organization of Multi-Day Ultramarathoners (“GOMU”) was incorporated with the  
25 purpose of overseeing multi-day World Records and host their own “World Championships.”  
26 It is not affiliated with USATF, World Athletics, or the IAU.

27           39. Because of her AuDHD, compliance with governing rules and procedures is very  
28 important to Camille, and she often speaks out against rule violators to ensure that all

1 ultrarunning events are properly operated in compliance with governing rules and procedures  
2 so that accurate results are recorded, minimizing cheating and upholding the integrity of the  
3 sport of ultrarunning.

4 40. Over the years, due to Camille's AuDHD traits, including specifically her sense  
5 of justice and need for adherence to rules, she has made multiple complaints to various  
6 governing entities relating to the ultrarunning community, track and field and sports generally.

7 41. Camille's rule/compliance complaints are generally found to be valid.

8 42. Examples, *inter alia*, of rule/compliance complaints Camille has filed include:

9 a. **October 2023**: Camille filed a complaint with SafeSport against Pam  
10 Smith because Smith had sent Camille an unwanted, inappropriate message gossiping about  
11 her (Camille) that mentioned "stealing", which lacked professionalism. SafeSport determined  
12 that Smith had violated the USATF Athlete Code of Conduct. The complaint included not  
13 only the unprofessional gossip message but also other examples of Smith's misconduct in her  
14 role as the 2023 US 24-hour Team Manager, including manipulating team selection and  
15 emotional harm her leadership had caused.

16 b. **August 2024**: Camille filed a complaint with the IAU regarding a 48-hour  
17 World Championship event that had been organized by GOMU, which the Vice President of  
18 GOMU, Viktoria Brown, participated in. The complaint was validated by a report by a World  
19 Athletics Grade A measurer on August 12, 2024, to ACU President Bernadette Benson when  
20 he stated that "**Camille is correct** that for a course to be validated after a potential record was  
21 set, then either the course is remeasured by an A or B measurer who was **not** the original  
22 measurer..." (emphasis added) and on August 3, 2023, IAU secretary Hilary Walker stated  
23 that **Camille is correct**, "the 48H Balatonfured race in May did not have the sanction of the  
24 Hungarian Federation and thus it was not awarded an IAU label". **Despite Camille's**  
25 **concerns being correct**, the ACU nevertheless improperly ratified Brown's 48Hr  
26 performance as a Canadian Record, told Brown and Cherns about Camille's concerns, and  
27 Brown began her public smear campaign in early August 2024 (addressed more fully herein).

28

1 c. **September 2024**: Camille filed a complaint with the IAU and others  
2 regarding a Denmark 6-day event on September 3, 2024. While she did not participate in the  
3 Denmark event, she observed that the rules had not been adhered to. After the event, it was  
4 widely publicized that a Danish athlete had broken Camille’s 6-Day ultrarunning record but  
5 in January 2025, IAU validated Camille’s complaints by voting to reject the Danish athlete’s  
6 performance in Denmark as a “world record” due to the “overwhelming assistance” received.

7 d. **May 2025**: Camille made a complaint to the Nevada Secretary of State  
8 regarding Canadian Viktoria Brown’s false registry and residency statements made on  
9 GOMU’s entity registration documents, which the Nevada Secretary of State **confirmed as**  
10 **true**. GOMU was forced to correct its registration in June 2025.

### 11 **Harassment of Camille, an AuDHD Athlete**

12 43. During the course of her ultrarunning career, Camille, who is an AuDHD athlete,  
13 has experienced criticism, harassment and professional jealousy from individuals within the  
14 ultrarunning community, including those who are part of the governance of the ultrarunning  
15 community.

16 44. Because of her insistence on rule compliance within the ultrarunning community,  
17 Camille has become known as a whistleblower, which makes her unpopular with those in the  
18 sport.

19 45. While Camille’s AuDHD sets her apart from many ultrarunners, all of her efforts  
20 to ensure rule compliance are done with the intention of bettering the sport of ultrarunning  
21 and ensuring fair competition for all competitors.

22 46. After the 2023-2024 complaints Camille initiated against Smith, Brown and  
23 GOMU, which included complaints involving its President Trishul Cherns, the harassment  
24 against Camille began to materially escalate, specifically including harassment by Brown.

### 25 **Wikipedia Disputes began in September 2023**

26 47. The Wikipedia issues Camille has experienced are just one instance of the pattern  
27 of targeted hostility she has had to face throughout her ultrarunning career.

1           48. The acts of targeted Wikipedia edits in 2023 marked the beginning of a broader  
2 misinformation campaign and ongoing hostility and retaliation against Camille that has  
3 harmed and continues to harm her professionally and personally.

4           49. Camille’s coach and husband, Conor, set up a Wikipedia account in 2016, using  
5 his longtime personal email address as a username, temporun73, to monitor and update the  
6 Wikipedia subject page addressing Camille’s lengthy and highly successful ultrarunner career.  
7 He’s had the same personal email address since 2002.

8           50. Beginning in 2023, Portland-based trailrunner and Wikipedia administrator,  
9 Steven Walling, removed accurate and well-sourced content, including disability details, from  
10 the Wikipedia page about Camille.

11           51. Despite being a longtime administrator, Steven Walling doesn’t disclose on his  
12 Wikipedia Talk page his conflict of interest as a trailrunner.

13           52. Some of the information Walling removed from the page about Camille in his  
14 Wikipedia administrator role was substantially identical to the same type of information he  
15 allowed other ultrarunners to put on their Wikipedia pages.

16           53. Despite Walling’s own conflict of interest as a trailrunner, which he doesn’t  
17 disclose, Walling and others accused Conor of having a conflict of interest in his Wikipedia  
18 editing, which ultimately caused Conor’s account temporun73 to be blocked.

19           54. Walling does not include in his Wikipedia page that he has a conflict of interest  
20 with Camille as he is a trailrunner and may feel intimidated by Camille’s accomplishments.

21           55. Conor used his Wikipedia account he set up to restore accuracy of Camille’s  
22 Wikipedia pages as well as to correct inaccuracies on several other ultrarunner’s pages when  
23 those pages falsely described the subject’s achievements.

24           56. Examples of well-sourced, accurate statements removed from the Wikipedia page  
25 about Camille include information about Camille’s life and her achievements including  
26 references to The Telegraph, Runner’s World, and Women’s Running.

27  
28



1           66. After Camille reported valid concerns at the end of July to the ACU regarding  
2 their ratification of GOMU Vice President, Viktoria Brown’s, 48Hr performance at the  
3 GOMU 48Hr “World Championship”, Benson did not keep Camille’s concerns confidential  
4 and in August 2024 informed Brown and Cherns, which resulted in a public smear campaign  
5 against Camille that is still ongoing today.

6           67. Looking for support, Camille messaged Australian Official and former GOMU  
7 board member Martin Fryer, who encouraged her to contact the IAU and report what was  
8 going on with GOMU.

9           68. Fryer told Camille that Cherns and Brown “will say whatever they want because  
10 GOMU is their baby and they get a lot of fringe benefits from it, a bit like the Olympic  
11 Committee etc. He makes race pay a fee for GOMU accreditation and to pay for his  
12 accommodations at the races as an official. It is a gravy train indeed”.

13           69. On August 3, 2024, IAU Secretary Hilary Walker validated Camille’s concerns  
14 regarding rule violations at the GOMU 48Hr “World Championship”, stating, “[Camille is]  
15 right...The IAU cannot recognize any performances achieved at that race.” Thus, Hilary  
16 confirmed the IAU cannot ratify Stine Rex’s 48Hr performance as a World Record.

17           70. On September 7, 2024, Davy Crockett, who manages a webpage known as  
18 “Ultrarunning History”, made a threatening statement to Camille’s mother because she  
19 (mother) supported Camille’s challenge to the GOMU 48Hr “World Championship”.

20           71. Because Camille’s mother had become so upset over the encounter with Crockett  
21 given the invalid position taken by Crockett, despite the fact that Camille’s position as to the  
22 invalidity of the 48Hr event was correct, and because Crockett had been a source of  
23 misinformation about unratified “historical bests”, Camille blocked Crockett.

24           72. Because Crockett’s webpage inaccurately recognized GOMU’s 48HR race and  
25 the Denmark 6-day event on September 3, 2024, GOMU has used its position in the  
26 ultrarunning community to amplify the misinformation being spread by Crockett.

1           73. In January 2025, the IAU Records Committee validated Camille’s second set of  
2 concerns by also voting to reject ultrarunner Rex’s Denmark 6 Day performance as a World  
3 Best due to “overwhelming assistance”.

#### 4                   **Canadian Running Routinely Publishes Articles Involving Camille**

5           74. Because she is one of the world’s most accomplished distance runners, Canadian  
6 Running has published over 30 articles involving Camille since 2012.

7           75. It is common for Canadian Running to contact Camille in Arizona to get her  
8 thoughts and comments on issues relating to ultrarunning.

9           76. Camille has had an open, cordial line of communication with Anne Francis,  
10 Defendant Canadian Running’s Editor, and Keeley Milne, Defendant’s Staff Writer, on  
11 Twitter/X for many years.

12           77. Conor has also had an open, cordial line of communication with Anne Francis  
13 and Keeley Milne via Camille’s business email account.

14           78. Camille has always respectfully communicated with Canadian Running and  
15 believed the parties had a respectful working relationship.

16           79. Defendant Canadian Running and its Editor Francis knew how to reach out to  
17 Camille quickly via DM.

18           80. Canadian Running was, and should have been, aware of Camille’s training  
19 schedules and when she was traveling in order to attend an ultramarathon and generally  
20 understood that it may take a few days before Camille was able to respond to its requests for  
21 information.

#### 22                   **Canadian Running Published an Article Defaming Camille, 23                   Ostracizing Her from the Ultrarunning Community**

24           81. On September 23, 2024, Canadian Running published an article by Marley  
25 Dickinson entitled *U.S. Ultrarunner Camille Herron Involved in Wikipedia Controversy* that  
26 contained false and Defamatory statements about Camille (“Defamatory Article”).

27           82. The following is a list of false and defamatory statements made in Canadian  
28 Running’s September 23, 2024, Defamatory Article:

1           a. **“U.S. ultrarunner Camille Herron involved in Wikipedia**  
2 **controversy.”** Camille was not directly involved in any conduct relating to Wikipedia,  
3 the operation of the Wikipedia page about her career or any changes to any Wikipedia  
4 pages;

5           b. **“[Camille’s] coach was caught removing accolades from other**  
6 **athletes and ‘fluffing’ her own page”**. Camille’s coach/husband was fully responsible  
7 for maintaining his Wikipedia account, temporun73, and updating the Wikipedia subject  
8 page about her career including by making all of the Wikipedia edits from his account.  
9 All edits made by Conor were in good faith, including defending Camille against ongoing  
10 harassment and ensuring not only the integrity of the page about Camille but the integrity  
11 about Wikipedia as a whole, including the accuracy, neutrality, and sourcing of other  
12 athlete pages. At all times, Conor cautiously complied with Wikipedia guidelines and  
13 based all actions on well sourced information. Conor never removed accurate accolades  
14 from any Wikipedia page;

15           c. **“The edits degraded Kilian Jornet and Courtney Dauwalter’s**  
16 **accomplishments while adding to Herron’s”**. None of the edits made by Camille’s  
17 coach/husband diminished any properly acquired achievements of Kilian Jornet, Courtney  
18 Dauwalter or anyone else. The edits that were made were made to correct inaccuracies in  
19 accord with Wikipedia’s guidelines regarding accuracy, neutrality, and sourcing.  
20 Dickinson apparently failed to check to see if the information removed was an accurate  
21 depiction of fact. Likewise, all changes to the page addressing Camille’s career merely  
22 addressed properly earned achievement that had been improperly removed from the page,  
23 another fact that had not been checked by Dickinson;

24           d. **“The edits have been traced back to Herron’s email and Holt’s IP**  
25 **address”**. The email address Canadian Running tracked down is the longtime email  
26 address belonging to Conor; it has never belonged or been used by Camille. Upon  
27 information and belief, Defendant Canadian Running’s “source” for this statement was  
28 an old public forum post (hearsay) from 2007 misattributing Conor’s email to Camille

1 (“witch hunt”). The IP address Canadian Running mentioned was unsourced and  
2 inaccurate. Camille and her husband had not lived in Oklahoma City at that time for  
3 almost a year at the time of the Defamatory Article’s publication

4 e. **“Warning messages were deleted by Herron’s account”**. The  
5 Wikipedia accounts did not belong to Camille. Warnings were disregarded because they  
6 were false accusations. All changes made by Conor were in good faith to correct  
7 inaccuracies in accord with Wikipedia’s guidelines regarding accuracy, neutrality, and  
8 sourcing and were based on well sourced information. Further, Wikipedia was not aware  
9 Wikipedia administrator, Steven Walling, himself, had a conflict of interest given his running  
10 rivalry with Camille.

11 f. **“The email linked to Temporun73 matched an address Herron  
12 used since 2007”**. Conor has owned temporum73 since 2002. Camille has an entirely  
13 different email address that was also created in 2002. She has never used temporum73 as  
14 her personal email account; Dickinson never sent Camille the 2007 public forum “source”  
15 containing the misattributed email to confirm its accuracy.

16 g. **“A Google search linked the blocked account to Holt’s name and  
17 an Oklahoma City phone number”**. Canadian Running’s IP address claim was  
18 unsourced. The phone number identified by Dickinson does not belong to Conor or  
19 Camille. Conor and Camille had not lived in Oklahoma City for almost a year at the time  
20 of the Defamatory Article’s publication.

21 h. **“One of the most contentious actions involved repeatedly removing  
22 statements like ‘widely regarded as one of the best trail runners ever’...while Herron  
23 simultaneously added a similar statement to her own page.”** This statement is false and  
24 misleading. The edits did not occur simultaneously. In February 2024, given the repeated  
25 removals of “puffery” on Camille’s page, Conor referenced similar pages and removed  
26 puffery across athlete pages to ensure neutrality and consistency. His intentions were in good  
27 faith and not “contentious”. Later in April 2024, he added a multi-sourced factual statement  
28 to Herron’s page (“widely regarded as one of the greatest ultrarunners”) as a consistency test.

1 That phrasing remains on peer athletes’ pages but was selectively removed from Herron’s  
2 page in September 2024 by, *inter alia*, an IP address in Portland where conflicted Trailrunner  
3 Steven Walling resides, illustrating the disproportionate targeting of her page. Wikipedia logs  
4 and independent sources confirm Conor’s contributions were good-faith, policy-compliant,  
5 and not self-promotional.

6 i. Quote from GOMU President and Canadian Trishul Cherns: “**citing**  
7 **World Athletics rules that do not apply to ultrarunning and multi-day running.**” The  
8 IAU is under the patronage of World Athletics. WA Competition Rules apply to ultrarunning  
9 and multi-day events.

10 83. The Defamatory Article’s narrative further falsely portrays Camille  
11 engaging in a “covert” and malicious Wikipedia attack. The edit histories of the relevant  
12 pages are public, logged, subject to oversight, and show a consistent record of good-  
13 faith, Wikipedia-compliant contributions to each Wikipedia page involved in what has  
14 been come to be known as the Herron Wikipedia Scandal.

15 84. GOMU President Cherns was the only person quoted in the Defamatory Article  
16 under the heading “Reaction”.

17 85. Defendant Canadian Running Editor Anne Francis knew relying on unchecked  
18 facts from Cherns was not reasonable as she had previously described event details and  
19 communications with Cherns on June 6, 2024, as “murky” and “not transparent”.

20 86. Despite knowledge of known animosity between Cherns and Camille in the  
21 ultrarunning community and the issue with Cherns’ transparency and questionable source  
22 validity, Defendant’s Defamatory Article cited Cherns’ reaction to the Wikipedia edits,  
23 quoting him saying “I was appalled by Camille’s criticism directed at athletes challenging  
24 ‘her’ records and her efforts to discredit them”.

25 87. Defendant Canadian Running went on to quote Cherns:

26 In my forty-six years of ultrarunning, I’ve never seen anyone as talented as  
27 Camille, who is so dedicated to creating division and animosity within the  
28 ultrarunning community. Unfortunately, the Wikipedia story is part of a pattern  
of interference. This couple has a history of trying to disrupt athletes, their

1 reputations, races, and performances by citing World Athletics rules that do not  
2 apply to ultrarunning and multi-day running...This unsportsmanlike behaviour  
3 is bullying and mean-spirited and has no place in the larger ultrarunning  
community.

4 88. Despite the known conduct challenges Camille had made against GOMU and  
5 Cherns, himself, in the ultrarunner community, Dickinson/Canadian Running failed to: a)  
6 reasonably confirm Cherns' statements; b) reasonably solicit Camille's comments to Cherns'  
7 comments; and c) acknowledge in any way Cherns' conflict of interest when it came to  
8 Camille and her actions; instead, holding Cherns out as a reliable, nonbias source.

9 **Canadian Running's Defamatory Article was Based on Gossip,  
10 Unverified and Outdated Sources and Biased Information**

11 89. The Defamatory Article relies on false hearsay statements from various public  
12 forums that misattributed an email address, fabricated IP/phone contact information, relied on  
13 gossip and false accusations made on Wikipedia "Talk" pages and biased quotes from Cherns.

14 90. During 2025 ultrarunning events, it was well known that Cherns would constantly  
15 talk about Camille in a negative context.

16 91. Despite Cherns' having conflicts of interest, he managed to position himself as a  
17 media source of information in the ultrarunning community, without regard to source of his  
18 information or its veracity thereof.

19 92. A mere 5 weeks before the publication of the Defamatory Article quoting Cherns  
20 negative statements about Camille, Cherns and Camille had engaged in a heated email  
21 exchange over Cherns/GOMU's failure to comply with any governing rule and false  
22 declarations that Camille's world record had been broken despite the fact that Camille's  
23 position had already been validated by IAU official Hilary Walker. Camille had requested  
24 GOMU correct its false public claims that Stine Rex had broken her 48-hour world record:

25 **Camille's August 15, 2024, Email to, *inter alia*, GOMU, Brown, Hearn, IAU**

26 The GOMU 48-hour event in Hungary wasn't sanctioned by the Hungarian  
27 Federation and not under the jurisdiction of World Athletics Competition  
28 Rules. It wasn't a record, World Best, or ranking eligible event. Looking at  
Canadian Athletics Record Rules, it says an event must be 'duly

1 sanctioned', which this event wasn't. Performances/records can't be fairly  
2 compared if they weren't achieved under the same rules.

3 World Athletics and the IAU Records Committees and Council, who take  
4 precedence, would never ratify these results for records/World Best, even if  
5 the event was sanctioned. Even the GOMU record application requirements  
6 weren't fulfilled. The event did not follow the WA Competition Rules,  
7 including the almost 7 hours of pacing by multiple athletes, lack of warning  
8 by an official, and the lack of remeasurement by a different World Athletics  
9 Grade A measurer. This event lacked oversight by Hungarian officials to  
10 enforce and follow the competition rules. I'll attach these rules. The GPS  
11 shows they didn't run the course as measured, being significantly short at  
12 both the turning point (675m vs 780m on the certificate) and the full loop  
13 (18.02m short). Without a remeasurement by a different Grade A measurer,  
14 these results haven't been verified and validated.

15 I'd appreciate you correcting the GOMU webpage and apologizing to me  
16 for continuing to make false claims and spreading false information about  
17 'World Bests' and National records. I shouldn't have to defend myself  
18 against others claiming my World Record was broken, when it wasn't.

### 19 **GOMU/Cherns' August 14, 2025, Response Email to Camille**

20 As the President of GOMU, I am kindly requesting that you cease engaging  
21 in disruptive behavior, refrain from attempting to undermine GOMU,  
22 displaying unsportsmanlike conduct toward our Vice President, Viktoria  
23 Brown, and harassing the athletes who participated in our 48-hour event.

24 Each national federation has its own criteria for national record ratification.  
25 Some, like Canada, do not require events to have an IAU label. The race  
26 organizers have submitted all essential documents for Viktoria Brown's  
27 Canadian national record ratification. The Association of Canadian  
28 Ultramarathoners (ACU) has dismissed your unfounded accusations, and  
her race record has been rightfully approved and ratified despite your  
attempts to intervene.

The course was accurately measured by a Jones wheel counter, and certified.  
Köridő, Hungary's top timing system (the timers for the EMU), used bib and  
ankle chips with a fully redundant backup system to score the 48-hour WC  
utilizing timing mats at multiple locations on the course. The course, marked  
by a shoulder-high wire fence (visible on the live stream), could not be cut,  
was not short, and the athletes ran the course as measured. Camille, please  
note that Strava data, which provides inaccurate GPS recordings and often  
fails to capture hours of data, as well as images from Google Maps with

1 drawn line to support your theories, does not meet the requirements for  
2 official course measurements.

3 I want to address your concern regarding potential pacing issues and rule  
4 implications. After reviewing your lap sheet copies, we respectfully  
disagree with your claim of 7 hours of pacing as an overreaching assertion.

5 No competitors complained about improper or unsporting conduct to the  
6 head Referee, Peter Pignitzky, or to anyone on his team about any athletes  
7 in the race. According to WA Rule #8.2 (enclosed), for someone to protest,  
8 one would have to file the complaint within 30 minutes after the end of the  
9 event. Additionally, the complainant must voice their protest to the Referee  
10 verbally and be a competitor in the same race, and not by someone who may  
11 have a vested interest in the individual's success or failure from outside the  
12 event, as it could potentially compromise their objectivity or neutrality.

13 Camille, your assumptions about why the Hungarian Athletics Association  
14 did not sanction the race are incorrect and unwelcome since you do not have  
15 any information regarding the matter. There was no 'lack of  
16 oversight/supervision by officials/referee/RD and enforcement of any  
17 rules.' as you claim. The race followed all WA/IAU rules, and a Federation-  
18 appointed head referee, Peter Pignitzky, who is WA and IAU certified,  
19 managed a team of referees on site.

20 The representatives at GOMU cannot continue to provide evidence to refute  
21 your repeated false claims. If you persist in spreading misinformation  
22 despite being presented with all the facts, we will have no option but to  
23 report your unsportsmanlike conduct to the head of USATF. GOMU also  
24 requests a public apology for disrespectful behavior toward all athletes,  
25 officials, organizers, and volunteers involved.

26 93. GOMU, multiple members thereof in addition to Cherns, and related parties want  
27 to control Camille and/or actively dislike her including Bob Hearn, GOMU's Record Keeper  
28 and 2023 and 2025 U.S. 24-hour Assistant Team Manager; Viktoria Brown, GOMU's Vice  
President and Canadian ultrarunner; and Pam Smith, 2023 and 2025 U.S. 24-hour Team  
Manager.

94. Shortly after Camille had set a 100-mile World Record and signed a Lululemon  
Agreement, Bob Hearn sent Camille a hostile, jealousy fueled message, which stated "Stop  
claiming records that are not currently recognized by anyone...**Maybe it matters to your**

1 **sponsors...**It comes across (**not just to me**) as exaggerating your accomplishments, not a  
2 picture we want to paint of our runners, or our sport more broadly.” (emphasis added).

3 95. The IAU is under the patronage of World Athletics and their Competition Rules,  
4 who distinguish records by surface. Thus, Camille has a right to claim surface-specific World  
5 Records.

6 96. Cherns was jealous of Camille’s lucrative and very public Ambassador  
7 Agreement with Lululemon and actually reached out to Conor to ask how to get such  
8 sponsorship.

9 97. After the launch of the lululemon FURTHER team and project in May 2023,  
10 Canadian Running Editor Anne Francis reached out to Cherns for a comment about it calling  
11 it “interesting (and weird)”, but she didn’t reach out directly to Camille.

12 98. Pam Smith, 2023 and 2025 U.S. 24-hour Team Manager, who crewed for Brown  
13 at Badwater.

14 99. Both Smith and Brown have shown resentment towards and dislike of Camille.

15 100. An example of the resentment shown Camille by Smith is the timing of an  
16 apology she was directed to give to Camille after Camille’s October 2023 SafeSport  
17 complaint. Smith sent the statement, which was not much of an apology, if at all, at 9:39 p.m.  
18 the night before Camille’s lululemon FURTHER 6 day race, as if intended to be deliberately  
19 disruptive.

20 101. After the September 23, 2024, Defamatory Article, GOMU Vice President Brown  
21 repeatedly made social media comments disparaging Camille and making negative comments  
22 about her mental health, only days before her planned race at Spartathlon.

23 102. Many athletes in the ultrarunning community have spoken out about Cherns and  
24 Brown.

25 103. Ultrarunner athlete legend Yiannis Kouros is very outspoken on the internet about  
26 GOMU Officers Cherns and Brown’s bad acts including shared experiences of rule/ethical  
27 violations and forging his (Kouros’) signature on GOMU World Championship certificates.

28



1           112. Camille also put the response to Dickinson’s email on the backburner, as  
2 Dickinson had clearly intended for her to do.

3           113. Had Dickinson not let Camille know that he was aware of her ongoing race  
4 preparations and her travels to Greece and expressly stated she need not worry about an  
5 immediate response just when she could, Camille would have let Conor know a more pressing  
6 response was due and timely responded for inclusion in Defendant Canadian Running’s  
7 September 23, 2024, Defamatory Article.

8           114. Camille relied on Dickinson’s express lack of urgency in not responding to his  
9 email in time for her to provide her comments to the Defamatory Article.

10           115. Because of her upcoming Greece ultramarathon, given her ultra focus, Camille  
11 was unable to fully process any of her email communications until after the race when she got  
12 home in October and had her computer back.

13           116. Despite specifically informing Camille that there was no rush on her comments  
14 to the Defamatory Article, Dickinson and Defendant Canadian Running rushed to publication  
15 of the Defamatory Article on September 23, 2024, without having received any response from  
16 Camille, before the completion of the Spartathlon scheduled for September 28-29, 2024, and  
17 without following up with Camille.

18           117. Immediately after the Defamatory Article was published, on September 23, 2024,  
19 Camille and Conor began to hear rumblings in the ultrarunner community about the Article.  
20 After driving and arriving in Tripoli, Conor finally opened Dickinson’s email.

21           118. Because of her mental health issues and the upcoming race, Camille was unable  
22 to read the full Defamatory Article until many weeks later.

23           119. By the time Camille was aware of the Defamatory Article, extensive damage was  
24 already done to her reputation; the damage to her mental health and finances was just  
25 beginning.

1                                   **Canadian Running’s Defamatory Article Immediately**  
2                                   **Began Receiving U.S. and Worldwide Amplification**

3           120. Following Defendant Canadian Running’s Defamatory Article, other news  
4 sources immediately picked up the story and continued to spread its defamatory statements  
5 through the running community using such sensational language as “scandal”, “covert”,  
6 “contentious”, “controversy” and “differences in values” in order to rile up and rally the  
7 ultrarunning community against Camille.

8           121. Upon information and belief, Defendant Canadian Running intended to  
9 sensationalize its Defamatory Article with the intent that other news outlets continue the story  
10 with credit being given to it (Canadian Running), which is exactly what happened.

11           122. Examples of the continuing wave of false news stories picking up on Defendant  
12 Canadian Running’s September 23, 2024, Defamatory Article includes, *inter alia*:

13           a. Athletics Illustrated published the following article on September 23,  
14 2024: *Camille Herron Caught Manipulating Wikipedia information on Herself and Editing*  
15 *Killian Jornet’s Profile*”. [Camille Herron caught in Wikipedia controversy](#);

16           b. Athletics Illustrated told readers that “Canadian Running Magazine  
17 journalist Marley Dickinson has exposed American ultramarathon runner Camille Herron and  
18 her coach for manipulating information on Wikipedia.” [Camille Herron caught in Wikipedia](#)  
19 [controversy](#);

20           c. On September 26, 2024, Runner’s World published an article entitled, in  
21 part, *Ultrarunner Camille Herron’s...Wikipedia Scandal*”, which credits Canadian Running  
22 as the source that broke the Camille Herron Wikipedia scandal, explaining, *inter alia*, that:

23           The report by *Canadian Running* showed how IP addresses linked to Herron  
24 and her husband, Conor Holt, made changes to the pages for Courtney  
25 Dauwalter and Kilian Jornet, among others. The report also said Herron ‘altered  
26 the ultramarathon Wikipedia page to remove references to Danish ultrarunner  
Stine Rex’s 48-hour and six-day world records.’ Rex ran the six-day record  
earlier this month, breaking Herron’s record from March.

27 [Camille Herron Dropped by Lululemon After Wikipedia Scandal](#);

1 d. On September 27, 2024, Women’s Health online published an article  
2 following up on Defendant Canadian Running’s Defamatory Article, captioned, in part,  
3 “Ultramarathon Runner Camille Herron...: Her Wikipedia Controversy, Explained”, which  
4 explained, *inter alia*, that “Camille Herron...the American athlete is involved in a scandal  
5 that’s rocking the ultramarathon community. It all stems from a bombshell Canadian Running  
6 piece, which reports changes to Wikipedia pages traced back to an email account and IP  
7 address linked to Camille and her husband/coach Conor Holt.” [Ultramarathoner Camille  
8 Herron's Wikipedia Controversy, Explained](#); and

9 e. Yahoo!Sports published an article on the Camille Herron Wikipedia  
10 scandal on September 27, 2024, captioned, *inter alia*, *Ultramarathon Runner...Amend a  
11 Wikipedia Scandal*”, which explained, *inter alia*, that:

12 Camille Herron, 42, is one of the world's top ultramarathon runners, having set  
13 12 world records and becoming the youngest woman to reach 100,000 lifetime  
14 running miles. But now, the American athlete is involved in a scandal that's  
15 rocking the ultramarathon community. It all stems from a bombshell *Canadian  
16 Running* piece, which reports changes to Wikipedia pages traced back to an  
17 email account and IP address linked to Camille and her husband/coach Conor  
18 Holt.

19 [This Ultramarathon Runner Was Dropped By A Major Sponsor Amid A Wikipedia Editing  
20 Scandal - Yahoo Sports](#).

21 123. Mainstream news outlet MSN also picked up on the Herron Wikipedia scandal,  
22 reporting, *inter alia*, that “[a]ccording to...Canadian Running magazine”, Camille Herron  
23 was caught making edits “to the Wikipedia pages of Kilian Jornet and Courtney Dauwaulter  
24 that appears to downplay those runners’ achievements, in addition to edits made to Herron’s  
25 own page which seem to inflate her accomplishments.” [Ultra runner Camille Herron dropped  
26 by sponsor after Wikipedia controversy involving edits to other runners' pages](#).

27 124. Multiple YouTube posts also spread the “Camille Herron Wikipedia  
28 Controversy”. For example, *inter alia*, [Bing Videos](#); [Bing Videos-II](#).

125. In addition to her name, Camille’s likeness is connected with each Wikipedia  
Scandal article published.

1                                   **Conor Holt’s September 24, 2024, Press Release**  
2                                   **Confirmed Camille’s Lack of Personal Involvement in the**  
3                                   **“Wikipedia Controversy” – But the Damage was Done**

4           126. Following the publication of the Defamatory Article, Lululemon reached out to  
5           Camille’s coach, Conor, urging him to make a public statement.

6           127. Lululemon did so merely for its best interest without regard to the truth of the  
7           events as Conor had made all Wikipedia edits in good faith for the purpose of upholding the  
8           integrity of the relevant Wikipedia pages and in accordance with Wikipedia’s own  
9           guidelines and policies, so no public statement should have been required.

10          128. Feeling pressured to do so by Lululemon and because of the extreme mental  
11          suffering the false allegations were causing Camille, on September 24, 2024, Camille’s  
12          husband and coach issued a public press release (“Press Release”).

13          129. While the Press Release was published on RunUltra, a digital platform focused  
14          on the ultrarunning community ([Camille Herron Press Release by Conor Holt - Run Ultra](#)),  
15          Defendant Canadian Running did not issue an article addressing the Press Release nor did it  
16          reach out to Camille to address the issue, as it had routinely done for over a decade when  
17          issues arose relating to her.

18          130. Conor’s Press Release provided, *inter alia*, that:

- 19               a. He – not Camille – maintains issues relating to Wikipedia;
- 20               b. Since 2023, Camille’s Wikipedia account had been under attack by cyber  
21               bullies “by the name of Steven Walling, Lilian Uwu, C.Fred, Melcous, and some more were  
22               repeatedly editing out significant parts of Camille’s life/biographical details.”;
- 23               c. Wikipedia blocked Conor’s account, temporum73, after he began adding  
24               back the deleted information on Camille’s Wikipedia page;
- 25               d. At all times, the information provided on Camille’s page was consistent  
26               with statements made by other athletes’ Wikipedia pages;
- 27               e. Because no Wikipedia rule had been violated, Conor created a second  
28               account, Rundbowie, in order to continue to protect Camille’s interests and mental health,

1 which allowed him to continue to edit Camille’s Wikipedia page that was still being altered  
2 by cyberbullies;

3 f. **“Camille had nothing to do with this. I am 100% responsible and**  
4 **apologize for...the wrong I did.”**

5 [Camille Herron Press Release by Conor Holt - Run Ultra](#) (original emphasis).

6 **Canadian Running Republished Part of Its September 23, 2024, Defamatory**  
7 **Article in December 2024 as It was the Top 2024 News Story**

8 131. In December 28, 2024, in an article entitled “Top Running Stories of 2024”,  
9 Canadian Running listed two articles specifically targeting Camille: “4. Lululemon Ends  
10 Partnership with Ultrarunner Camille Herron” and “1. U.S. Ultrarunner Camille Herron  
11 Involved in Wikipedia Controversy” (“Republished Defamatory Article”). [Canadian](#)  
12 [Running's top 10 running stories of 2024 - Canadian Running Magazine](#).

13 132. As part of Defendant Canadian Running’s December 28, 2024, Republished  
14 Defamatory Article, it restated several of its previous Defamatory statements about Camille.

15 133. The Defamatory statements republished by Canadian Running on December 28,  
16 2024, include the following statements:

17 a. Camille Herron was “caught removing accolades from other athletes’  
18 Wikipedia pages and ‘fluffing’ her own.”

19 b. The edits Camille Herron made to the Wikipedia pages of ultrarunners  
20 Kilian Jornet and Courtney Dauwalter “degraded their accomplishments, while also adding  
21 accolades to Herron’s own page.”; and

22 c. The edits Camille made to the above Wikipedia pages “were all traced  
23 back to Herron’s email”.

24 [Canadian Running's top 10 running stories of 2024 - Canadian Running Magazine](#).

25 134. Canadian Running included a large photo of Camille immediately under the  
26 defamatory comments in the Republished Defamatory Article. [Canadian Running's top 10](#)  
27 [running stories of 2024 - Canadian Running Magazine](#).

1 135. Nowhere in Canadian Running’s Republished Defamatory Article did it include  
2 any statement from Camille, mention the Press Release or otherwise inform readers that  
3 Camille and her coach had denied her personal involvement in the Wikipedia controversy and  
4 failed to mention any conflict of interest between Cherns and Camille.

5 **Camille has Lost Lucrative Business Deals Due**  
6 **to Canadian Running’s Defamatory Article**

7 136. Camille signed an agreement with Lululemon in late 2022 for the promotion of  
8 their sport clothing and shoes (“Ambassador Agreement”).

9 137. After Camille entered into the Lululemon Agreement, the harassment and  
10 professional jealousy from individuals in the ultrarunning community and governing groups  
11 began to escalate.

12 138. After the Lululemon FURTHER project launched in 2023, the harassment and  
13 professional jealousy from individuals in the ultrarunning community and governing groups  
14 intensified even more.

15 139. Camille was harassed about her Lululemon relationship over issues to which she  
16 had no control such as, *inter alia*, the athlete selections for the team, why there were no  
17 Canadian women on the team, etc.

18 140. After compelling Camille’s coach to make a Press Release, within hours after the  
19 Press Release, Lululemon verbally terminated Camille’s Ambassador Agreement.

20 141. Two days after Defendant Canadian Running’s Defamatory Article, on September  
21 25, 2024, Lululemon officially notified Camille that her Ambassador Agreement was  
22 terminated.

23 142. Camille’s termination from Lululemon was **without cause**, although a public  
24 statement was issued by Lululemon stating that it had parted ways with Camille due to a  
25 “difference in values”.

26 143. Despite Camille’s many ultrarunning accolades and longtime advocacy for sports  
27 integrity, she is no longer able to obtain sponsorship or ambassador agreements following the  
28 Defamatory Article and Lululemon’s “difference in values” statement.



1 leadership roles in the running community including her 12-year position as secretary of the  
2 USATF Women’s LDR Committee.

3 153. While interim sanctions were immediately issued against Camille based on a  
4 mere unsubstantiated three-sentence complaint, no interim sanctions were imposed against  
5 Pam Smith when Camille made a detailed documented complaint to SafeSport that  
6 demonstrated Smith’s misconduct.

7 154. In an October 14, 2024, email from a former Women’s LDR chair, Mickey  
8 Piscitelli, Camille was informed that a USATF board member and an Athletes Advisory  
9 Committee (AAC) representative, both current or former members of the Women’s LDR  
10 Committee, pressured her to remove Camille from the Women’s LDR position following  
11 publication of the Defendant Canadian Running’s September 23, 2024, Defamatory Article.

12 155. The pressure to remove Camille from her Women’s LDR position included:

- 13 a. Questioning of Camille’s integrity;
- 14 b. Assuming Camille was “guilty by association” in the Wikipedia scandal  
15 despite her AuDHD preventing her from effectively engaging in any such communication;
- 16 c. Concerns that Camille’s continued presence on the Women’s LDR  
17 committee would harm the committee requiring that she be excluded from voting on any  
18 athlete-related matters; and
- 19 d. Statements that Camille’s involvement with the Women’s LDR meant the  
20 committee was “no longer above reproach”.

21 156. Because of the pending undisclosed SafeSport complaint and the outside USATF  
22 request, to protect her rights, Camille has effectively been forced into silence in the  
23 ultrarunning community – the very result GOMU, Cherns, Brown, Hearn and Smith sought  
24 to bring about in their campaign against Camille.

25 157. Because of her forced silence, Camille is not able to correct the false allegations  
26 made against her, allowing false narratives to grow and spread throughout the ultrarunning  
27 community unrestrained by facts and reality, including false and mocking comments made by  
28 GOMU members/officers Brown and Hearn on the US 24-hours Team Facebook page and

1 defamatory comments made about Camille after the IAU posted their athlete of the year on  
2 Facebook.

3 158. Despite an arbitrator having submitted a report to the USATF in March 2025, as  
4 of the filing of this Complaint, the USATF has remained silent, and no ruling has been issued.

5 159. The actions the USATF has taken against Camille coupled with its failure to  
6 timely resolve the SafeSport complaint against her while ignoring her valid, well documented  
7 complaints against members of various governing entities in the ultrarunning community  
8 demonstrates that she is not only being targeted but retaliated against for her whistleblowing  
9 actions, actions undertaken due to her rigid approach to rules and high justice sensitivity  
10 arising from her AuDHD, demonstrating that Camille is also being discriminated against  
11 because of her disabilities.

12 160. In January 2025, two days after the IAU rejected Stine Rex's 6-day result based  
13 on Camille's complaint, Bob Hearn, GOMU Record Keeper and U.S. 24-hour Assistant Team  
14 Manager, publicly posted a misleading statement suggesting that the IAU had not yet issued  
15 a ruling spurring more derogatory statements about Camille.

16 161. On March 4, 2024, GOMU Vice President Brown appeared on a podcast  
17 continuing her pattern of public hostility against Camille.

18 162. Camille has also been publicly shamed based on her AuDHD.

19 163. The unmoderated, unchecked and hostile public comments being carried out by  
20 individuals affiliated with the US 24-hour Team, IAU, and GOMU demonstrates a  
21 concentrated pattern of abuse, public shaming and retaliation against Camille materially and  
22 negatively impacting not only her ultrarunning performance but her mental health, no doubt  
23 the intent of all such comments.

24 164. Due to Brown's emboldened blatant targeting of Camille after publication of the  
25 Defamatory Article, Karina Ray, an employee of Mount to Coast ("MTC") who was a GOMU  
26 sponsor and upon information and belief, who also sponsored Cherns and Brown, privately  
27 messaged Camille to apologize for Brown's "atrocious" post about Camille, informing  
28 Camille that Mount to Coast would be addressing the issue with both Brown and Cherns.

1 165. In May 2025, MTC reported numerous athlete concerns about GOMU President  
2 Cherns to MTC leadership and, upon information and belief, in August 2025, MTC terminated  
3 its association with GOMU and Cherns, although it appears they continue to sponsor Brown.

4 166. Despite the pending anonymous complaint, given Camille’s rigid approach to  
5 rules and justice sensitivity due to her AuDHD, Camille posted three public statements merely  
6 aimed at addressing retaliation backlash, ongoing rule violations and her long-standing  
7 advocacy for clean sports – May 24, 2025: [Continued Rule Violations and Harm to me and](#)  
8 [others](#); May 26, 2025: [Why Integrity, Fairness, and Rules matter](#); May 27, 2025: [cleansport](#).

9 167. Since June 2025, Brown has become uncharacteristically absent from social  
10 media posts in the ultrarunning community and has deleted/changed many of her previous  
11 comments; unfortunately, the damage to Camille’s reputation, financial stability and mental  
12 health, which is not so easily vacated, devastatingly remains.

13 **Camille has been and Continues to be Materially and**  
14 **Significantly Damaged Professionally and Personally**

15 168. The events transpiring as a direct and proximate result of Defendant Canadian  
16 Running’s September 23, 2024, Defamatory Article have taken a devastating toll on Camille’s  
17 physical and mental health, wellbeing, and career.

18 169. Camille has not felt able to train or compete at her full capacity since she learned  
19 of the September 23, 2024, Defamatory Article and feels unsafe when she has been around  
20 other athletes at competitive events where she is constantly stared at and talked about.

21 170. Since the publication of the September 23, 2024 Defamatory Article, Camile has  
22 experienced chronic sleep deprivation, heightened trauma symptoms, and suicidal thoughts,  
23 which have contributed to three Did Not Finish races and a race withdrawal in July 2025.

24 171. Because of her AuDHD, Camille’s trauma is significantly amplified, leading to  
25 sensory overload, autistic shutdowns, and sustained emotional dysregulation.

26 172. As a direct and proximate result of Defendant Canadian Running’s publication of  
27 the September 23, 2024, Defamatory Article, Camille reached a state of “Autistic burnout” in  
28 July 2025, which required her to miss several weeks of training.

1 173. Camille has not only lost her Lululemon ambassador agreement, she has lost  
2 multiple sponsors and her broader professional support system.

3 174. Camille has been without sponsors for almost a year; her current income is  
4 minimal as she is now limited to only online coaching income, requiring Conor to obtain a  
5 coaching job out of state, which leaves Camille to live on her own, further exasperating her  
6 AuDHD issues.

7 175. At age 43, Camille still has at least 10–20 years of elite performance potential in  
8 Ultrarunning and had hoped to serve as a lifetime ambassador for the sport, especially as a  
9 trailblazer for women and neurodivergent athletes.

10 176. Given her AuDHD and the changes in her life since the publication of the  
11 September 23, 2024, Defamatory Article, Camille has been forced to live with new and added  
12 stresses in her life that are very challenging for her.

### 13 CAUSES OF ACTION

#### 14 **COUNT I**

#### 15 **Defamation**

16 177. Plaintiff repeats and restates all allegations as if fully set forth herein.

17 178. Defendant Canadian Running publicly published a Defamatory Article on  
18 September 23, 2024, asserting that Camille was personally involved in a Wikipedia scandal  
19 that falsely described her accomplishments while taking down well-earned accomplishments  
20 on other ultrarunner Wikipedia pages as set out in detail herein.

21 179. Defendant Canadian Running's Defamatory Article included blatantly false and  
22 intentionally misleading statements designed to inflict reputational harm on Camille.

23 180. All statements, insinuations, implications, and innuendos alleged herein by  
24 Defendant Canadian Running were false and defamatory, bringing Camille into disrepute,  
25 contempt, and/or ridicule within the ultrarunning community specifically and the athletic  
26 community in general.

27 181. None of the statements, insinuations, implications, and innuendos made by  
28 Defendant Canadian Running were privileged.

1 182. Defendant Canadian Running published the statements, insinuations,  
2 implications, and innuendos with actual malice as it knew the statements insinuations,  
3 implications, and innuendos were false or made with reckless disregard as to whether or not  
4 the statements, insinuations, implications, and innuendos were true or false.

5 183. Each statement, insinuation, implication, and innuendo alleged herein, singularly  
6 or in combination, has impeached and continues to impeach the honesty, integrity, and  
7 reputation of Camille.

8 184. Defendant Canadian Running is liable for at least presumed damages as the  
9 statements, insinuations, implications, and innuendos were made within the context of  
10 Camille's business profession – ultrarunning.

11 185. As a direct and proximate result of Defendant Canadian Running's conduct,  
12 Camille has been damaged by losing existing and prospective sponsorship and ambassador  
13 agreements and/or sponsorship opportunities.

14 186. As a direct and proximate result of Defendant's conduct, Camille has suffered  
15 mental anguish, emotional distress, pain and suffering, humiliation, harm to reputation, and  
16 loss of enjoyment of life and other consequences as set out herein.

17 187. All of Defendant Canadian Running's false and misleading statements,  
18 insinuations, implications, and innuendos were published with actual malice for the specific  
19 purpose of damaging Camille's good name, standing, and reputation in the ultrarunning  
20 community. Accordingly, Camille is entitled to an award of punitive damages in an amount  
21 sufficient to punish Defendant and deter others from engaging in the same or similar conduct.

## 22 **COUNT II**

### 23 **Intentional Interference with Business Contract and Expectancies**

24 188. Plaintiff repeats and restates all allegations as if fully set forth herein.

25 189. Camille had a valid business contract with Lululemon and valid business  
26 expectancies with other athletic entities given the fact that she remains one of the top  
27 ultrarunner athletes in the world, especially in light of her ability to proudly represent athletes  
28 with disabilities.

1           190. Defendant Canadian Running intentionally or recklessly made false and  
2 misleading defamatory and malicious statements, insinuations, implications, and innuendos  
3 about Camille to the ultrarunning community.

4           191. Defendant Canadian Running's intentionally or recklessly false and misleading  
5 defamatory and malicious statements, insinuations, implications, and innuendos about  
6 Camille to the ultrarunning community was done with actual malice with the intent to interfere  
7 with Camille's valid business contract and business expectancies or with reckless disregard  
8 as to the consequences to Camille.

9           192. Defendant Canadian Running had an improper motive when it interfered with  
10 Camille's business expectancies, in that it intentionally sought to belittle, humiliate, and  
11 embarrass Camille.

12           193. Defendant Canadian Running's interference was improper and for the self-  
13 serving purpose of sensationalism for the singular goal of increasing its own readership.

14           194. As a direct and proximate result of Defendant Canadian Running's improper  
15 conduct, Camille has been damaged in an amount to be proven at trial.

16           195. Defendant **Canadian Running acted with an evil mind and with such**  
17 **aggravated and outrageous conduct that punitive damages are warranted.**

18  
19           **WHEREFORE**, Plaintiff Camille Herron respectfully request judgment against  
20 Defendant Canadian Running as follows:

- 21           1. For compensatory damages in an amount to be proven at trial;
- 22           2. For punitive damages in a total amount to be proven at trial;
- 23           3. For pre-judgment interest on all liquidated amounts at the highest rate allowed by  
24 law;
- 25           4. For post-judgment interest at the highest rate allowed by law;
- 26           5. For such other relief as the Court deems proper and just.

27           DATED this 22nd day of September, 2025.

**SILENCE LAW GROUP**

/s/ Gideon Esakoff

Jeffrey Silence  
Gideon Esakoff

Filed through TurboCourt on September 22, 2025.

/s/ Gideon Esakoff

Gideon Esakoff

**SILENCE LAW GROUP**

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