



Civil Resolution Tribunal

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Type: Small Claims

Civil Resolution Tribunal

Indexed as: *Summers v. Google Canada Corporation*, 2025 BCCRT 166

B E T W E E N :

BILL SUMMERS

APPLICANT

A N D :

GOOGLE CANADA CORPORATION

RESPONDENT

REASONS FOR DECISION

Tribunal Member:

Kristin Gardner, Vice Chair

INTRODUCTION

1. This is a summary decision from the Civil Resolution Tribunal (CRT), dismissing this dispute due to lack of standing.
2. The applicant, Bill Summers, says that the respondent, Google Canada Corporation, has failed to flag and remove false one-star Google review ratings,

leading to business losses. He asks for an order that the respondent remove the negative reviews and pay \$5,000 for “damages to dignity”.

3. The respondent says that Google Search, Google Maps, and Google My Business, are all services administered by Google LLC, a company incorporated in Delaware. The respondent says that it is a separate corporate and legal entity from Google LLC, which has no employees and no place of business in Canada. In other words, the respondent says that the applicant has named the wrong company as a respondent to this dispute. The respondent also denies that it is responsible for any allegedly false reviews posted on the Google platform.
4. The applicant is self-represented. The respondent is represented by an employee.

JURISDICTION AND PROCEDURE

5. These are the CRT’s formal written reasons. The CRT has jurisdiction (meaning “legal authority”) over small claims brought under section 118 of the Civil Resolution Tribunal Act (CRTA). Section 2 of the CRTA states that the CRT’s mandate is to provide dispute resolution services accessibly, quickly, economically, informally, and flexibly. In resolving disputes, the CRT must apply principles of law and fairness.
6. CRTA section 39 says the CRT has discretion to decide the hearing’s format, including by writing, telephone, videoconferencing, email, or a combination of these. Here, I find that I am properly able to assess and weigh the documentary evidence and submissions before me. Further, bearing in mind the CRT’s mandate to provide proportional and speedy dispute resolution, I find that an oral hearing is not necessary in the interests of justice.
7. CRTA section 42 says the CRT may accept as evidence information that it considers relevant, necessary and appropriate, whether or not the information would be admissible in court.

8. A CRT case manager referred this dispute to me during the facilitation phase to decide the preliminary issue of whether the CRT should refuse to resolve this dispute because it is outside the CRT's jurisdiction, or whether it should be dismissed because the applicant has named the incorrect parties. The parties provided their submissions on this preliminary issue only.

ISSUE

9. The issues before me are:
 - a. Does the CRT have jurisdiction to decide the claims in this dispute?
 - b. Are the correct parties named?

EVIDENCE AND ANALYSIS

10. I have reviewed the Dispute Notice, the Dispute Response, and the parties' submissions on the preliminary issues.
11. As noted, CRTA section 118 gives the CRT authority to consider small claims disputes for damages claims. However, CRTA section 119(a) specifically says the CRT does not have jurisdiction over a small claims dispute for libel, slander, or malicious prosecution. Libel and slander are the two types of defamation (written and verbal). So, I find the CRT does not have jurisdiction to decide claims about defamation.
12. The respondent argues that the applicant's claim is essentially for alleged defamation in the form of false Google reviews. I disagree. The applicant does not suggest that the respondent wrote or posted the allegedly false reviews. Rather, I find the applicant is saying the respondent has a duty to respond to reports of false reviews and remove them. So, I find the applicant's claim is reasonably construed as a claim for damages based in negligence, which falls within the CRT's small claims jurisdiction under CRTA section 118.

13. That said, I agree with the respondent that the CRT does not have jurisdiction to order all the claimed remedies. As noted, the applicant seeks an order compelling the respondent to remove negative reviews. Under CRTA section 118, the CRT has limited authority to order someone to do something, which is called injunctive relief. That is, the CRT can only order injunctive relief when it relates to returning personal property or specific performance of a contract. I find neither situation applies here, and so the CRT cannot make the requested order to remove the negative reviews.
14. CRTA section 10(2) says that a claim can be amended to remove issues that are not within the CRT's jurisdiction. However, I decline to amend the applicant's claim to remove the remedies not within the CRT's authority because I find the applicant has not named the correct parties, and so this dispute cannot proceed in any event.
15. First, I address the applicant. In their submissions, the applicant says that a numbered company, doing business as WE GRILL, is the entity that suffered harm from the false reviews. I infer that the applicant is a principal of the incorporated company. However, a corporation is a separate legal entity from its principals. This means that a corporation's principal does not have standing (meaning "legal right"), to bring a claim in their own name to recover damages suffered by the corporation. As the applicant does not have standing to bring claims on the corporation's behalf, I find the applicant's claims must be dismissed.
16. Further, even if the applicant had standing to bring their claims for business losses, I would have dismissed this dispute against the named respondent.
17. As noted, the respondent says that it does not administer the online services on which the allegedly false reviews have been posted. The respondent says that a separate company, Google LLC, is responsible for those services, and that the respondent has no authority to remove the allegedly false reviews.
18. The applicant does not dispute that Google LLC operates the relevant platforms on which the reviews are posted. However, the applicant argues that Google LLC is the respondent's parent company, and so Google LLC cannot be completely

disconnected from its Canadian operations. The applicant provided no evidence to support these submissions. In any event, even if Google LLC is the respondent's parent company, I find that does not mean the two companies are interchangeable such that the respondent is responsible for the platforms operated by Google LLC on which the reviews are posted. Overall, I am satisfied that Google Canada Corporation is a separate company from Google LLC, and that Google Canada Corporation is not the correct respondent to this dispute.

19. Since I have found that neither the named applicant nor the named respondent is a proper party to this dispute, I dismiss the applicant's claims.
20. As the applicant was unsuccessful, I dismiss their claim for reimbursement of CRT fees, pursuant to CRTA section 49 and the CRT rules. The respondent did not pay any fees or claim any expenses.

ORDER

21. The applicant's claims are dismissed.

Kristin Gardner, Vice Chair