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Reply to/Communiquez avec:
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May 7, 2019

BY EMAIL

Ottawa-Outaouais IWW
PO Box 36042, 1106 Wellington Street
Ottawa, Ontario K1Y 4V3
info@ottawaiww.org

Dear Sir/Madam:

Re: IWW's Defamatory Facebook Activities
Our Reference: CNPW-0859

We represent the Canadian Union of Postal Workers ("CUPW"), along with its National Executive Board, which include both National Secretary Treasurer Bev Collins, and 1st National Vice-President Jan Simpson.

The Ottawa-Outaouais IWW ("IWW") has been engaged in a repeated, persistent and unwarranted social media attack on CUPW and its leadership. Through this aggressive campaign, the IWW has posted numerous statements on its Facebook page which are untrue, disparaging and defamatory. This pattern of defamatory conduct has culminated in its most recent post, on May 6, 2019, which "shared" the CUPE 4600 Women's Caucus' post of May 6, 2019, a copy of which is attached for reference. This post references an alleged incident between one of CUPE 4600's members and Ms. Simpson outside the CUPW office. This post's description of events is exaggerated, untrue, taken out of context, and unlawfully damaging to the reputation of CUPW and Ms. Simpson.

This letter serves as a Notice of Libel pursuant to the *Libel and Slander Act*, R.S.O., c.L-12, and any other applicable provincial legislation across Canada, in relation to the aforementioned Facebook post published by you on May 6, 2019. It also constitutes notice of our client's intention to take legal action against the IWW as well as all of the individual members of the IWW who have had any involvement in approving or publishing statements about CUPW and the National Executive Committee, which are untrue and are disparaging of our client.

As indicated, the above referenced post and all of the preceding posts, contains untrue, disparaging and defamatory statements about CUPW and its leadership, and is likely to have caused damage to CUPW's professional reputation and business interests, as well as to the personal and professional reputation of individual members of the CUPW leadership. This post is one among many which attacks CUPW and specifically singles out either Ms. Collins or Ms.



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Simpson, and which constitutes defamation. Moreover, it is not a coincidence that the IWW has personally attacked the only two female members of the National Executive Board.

All disparaging Facebook posts, including the one specifically noted herein, must be removed, and a retraction posted in their place, by no later than May 10, 2019 at 5:00 p.m. A draft copy of the retraction should be sent to us for review. Further, we urge you to cease and desist from any further conduct which directly or indirectly disparages or maligns CUPW, or its leadership or staff, in any public forum whatsoever and particularly via social media. The actions taken by the IWW constitute cyber bullying and must stop.

We would ask you to bring this letter to the attention of the individual members of the IWW who have been involved in approving or publishing these defamatory statements, as we will be seeking damages from all such individuals. Given that the actions of the IWW and its members are motivated by malice, the amount of damages we will be seeking will be substantial.

Our client reserves the right to undertake further legal action.

Yours very truly,

David Migicovsky
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Enclosure