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File No.: 253729.14288/14288

BY EMAIL <u>lukeford@comcast.net</u>
AND MAIL.

Lukeford 264 S. La Cienega Blvd. Beverly Hills, CA 90211 United States

Attention: Mr. Luke Ford

Dear Sirs/Mesdames:

Re: Defamatory information posted about Mr. Steven Joel Levin

We are counsel for Mr. Steven Joel Levin. Our client has recently become aware of information posted about him at the website address http://lukeford.net/profiles/profiles/steve_levin.htm for which your company holds the registered domain name. Much of the information posted on the website is defamatory; we request that the offensive portions be taken down immediately and that you refrain from posting any other defamatory information about Mr. Levin in the future.

Your website delves into very personal aspects of Mr. Levin's life using inaccurate and incomplete information. It appears that you have not been provided the full story regarding Mr. Levin. The false and misleading statements are defamatory and viciously attack the personal and professional integrity of our client.

Court records from the Levin Divorce

Your website refers to false allegations of physical and sexual abuse which were made by Mr. Levin's ex-wife during their divorce proceedings. Mr. Levin's ex-wife ultimately withdrew these allegations and a court order was rendered by Mr. Justice Cullen of the Supreme Court of British Columbia holding that Mr. Levin is not and has never been a risk to his child's safety.

Your website provides an excerpt of Reasons for Judgment rendered on September 4, 2001, in which Mr. Justice McEwan considers the allegations that Mr. Levin physically

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and sexually abused his child. These Reasons for Judgment represent only a fraction of the proceedings in an ongoing dispute between the parties over access to their child. After thoroughly investigating the allegations made against Mr. Levin, the Vancouver Police Department and the provincial Ministry for Children and Families closed their investigations in October 2002. The Ministry provided Mr. Levin with a letter stating its conclusion that Mr. Levin did not abuse his child and posed no risk to him. Furthermore, on January 27, 2003, during a court hearing dealing with the sexual abuse allegations, Mr. Levin's ex-wife recanted her allegations and consented to the following order of Mr. Justice Cullen of the Supreme Court of British Columbia, which varied Mr. Levin's access to allow unsupervised visits:

"THIS COURT DECLARES THAT:

"The Plaintiff is not and has never been a risk to Zachary's safety or security and by consent.

THIS COURT FINDS THAT:

There is no objective basis to the allegation that the Plaintiff has sexually abused Zachary and by consent."

By omitting to provide the complete set of facts surrounding the allegations made against Mr. Levin, your website leaves the false impression that there is still a question as to whether he is the perpetrator of the heinous crime of child abuse. As we have explained above, this suggestion is wholly false.

Excerpt from a Defamatory Anonymous Email

Your website also posts an excerpt from an anonymous defamatory email that circulated widely in the Vancouver Jewish community on October 11, 2005. This excerpt contains the same false and misleading statements with regard to allegations of child sexual abuse by Mr. Levin. It suggests that the synagogues that currently employ our client have put their congregants' children at the risk of harm. These assertions are baseless and cruel. As stated above, have the Vancouver Police Department and the Ministry for Children and Families cleared Mr. Levin of the allegations, his ex-wife recanted the allegations and consented to the aforementioned order allowing Mr. Levin access to their child. The excerpt contains numerous other false allegations.

Conclusion

The profile of Mr. Levin that you have posted on your Internet website is replete with false and misleading statements pertaining to some of the most serious allegations that could be levied against a member of Canadian society: physical and sexual abuse. This



defamation robs our client of his integrity as a human being and of his reputation as a religious leader.

We trust that in posting the information about Mr. Levin on your website, your motivations were to condemn the perpetration of physical and sexual abuse and to protect the public. However, now that you are aware that the material is false and misleading, we request you act responsibly and immediately take down the website located at http://lukeford.net/profiles/profiles/steve_levin.htm. Furthermore, we ask that you provide us with the source of your information about Mr. Levin so that we may ensure he is not subject to any further defamation.

Yours truly,

FASKEN MARTINEAU DUMOULIN LLP

David Wotherspoon

DKW/BBG