

R. Mitchell Rowe

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22 March 2017

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Faduma Wais
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Morissa-Dalhia Ellis
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Hadi Wess
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Michel Antoun
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Graham Robertson and The Fulcrum
631 King Edward Private
Ottawa, Ontario
Attention: Savannah Awde
editor@thefulcrum.ca

Dear Sirs/Mesdames:

RE: Notice of Libel: Romeo Ahimakin

I am retained by Mr. Romeo Ahimakin.

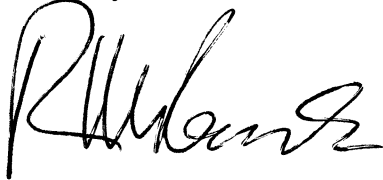
Please find enclosed Notice of Action asserting that you have each defamed Mr. Ahimakin, as set out therein. The false statements made by you have caused Mr. Ahimakin emotional injury and damage to his reputation.

I am instructed to seek immediate relief in the form of a claim for damages to him and to his reputation caused by your defamation, including all other legal remedies available to him under the law and all other legal costs.

I recommend you consult with a lawyer regarding this matter. If you or your lawyer has any questions, please contact me directly.

Please govern yourself accordingly.

Yours truly,

A handwritten signature in black ink, appearing to read "R. Mitchell Rowe". The signature is fluid and cursive, with a large initial "R" and a stylized "M".

R. Mitchell Rowe
Enclosure

c.c. R. Ahimakin

ONTARIO
SUPERIOR COURT OF JUSTICE

IN THE MATTER OF an intended action

BETWEEN:

ROMEO AHIMAKIN

Plaintiff

- and -

**VANESSA DORIMAIN, FADUMA WAIS, MORISSA DALHIA-ELLIS,
HADI WESS, MICHEL ANTOUN, GRAHAM ROBERTSON
and THE FULCRUM**

Defendants

NOTICE OF ACTION

Pursuant to section 5(1) of the *Libel and Slander Act*, R.S.O. 1980, c. 237, Romeo Ahimakin hereby complains of, and objects to, certain passages read out at the public meeting of the Board of Administration of the University of Ottawa Student Federation on March 5, 2017, which were reported on by Graham Robertson and published by The Fulcrum, the University of Ottawa student newspaper, on The Fulcrum Facebook page on March 6, 2017 and in The Fulcrum newsprint format on March 9, 2017;

The passages cited below are libellous and first came to the knowledge of Romeo Ahimakin at the Board of Directors meeting on March 5, 2017. The matters complained of are as follows:

Vanessa Dorimain and Faduma Wais

A report read by Faduma Wais and authored by Vanessa Dorimain represented that:

Your President Romeo Ahimakin has been abusing his power in the office ...

Romeo is a violent misogynistic person who likes to control his surroundings. He shuts down women and tries to over power in most if not all conversations ...

Romeo started to spread rumours about my relationship with Rizki in order to

create some type of order in the office where everyone should feel like they need to come to HIM first and not the people they are most comfortable with. He has put his hands in my face like he was going to hit me, he has yelled at me, been dismissive to my concerns, ignored directives on how to support, missed important meetings with me and other stakeholders on campus or the CFS. He has done this because he feels as if he has no control over this executive, despite knowing that his role is one of support and NOT control.... I want to be very clear when I say that I handle mine but as mentioned before that does not matter when you have others actively trying to bring you down by ruining your credibility, your portfolio and tarnishing your name.

This person is someone I used to call my friend and is now someone I fear in the office...

Morissa Dalhia-Ellis

Morissa Dalhia-Ellis stated at the same meeting of the Board of Administration of the University of Ottawa Student Federation on March 5, 2017:

Just myself echoing what another black fem in this work space has said, certain members of the executive do engage in misogynistic behaviour especially in terms of misogynoir so there have been moments where I have been silenced by the president, there have been moments where in terms of in discussions I've been laughed at, or essentially my qualms or my attitude, in terms of that, I've been tone policed...."

Hadi Wess

Hadi Wess stated at the same meeting of the Board of Administration of the University of Ottawa Student Federation on March 5, 2017:

I just want to echo a little bit Vanessa's report with regard to our president. I do not want to go into detail because enough has been mentioned but I do want to mention that it's been extremely difficult to work with Romeo for the past few months...

I've been yelled at in front of staff, I've had phone calls with Romeo where Romeo would hang up in my face in front of people that are present in the office...

Other things including commitment to events, to showing up to things, executive meetings have become a very unsafe space for myself and other executives because every agenda point has to become an argument with Romeo.

Michel Antoun

Michel Antoun recorded a video of the statements made by Vanessa Dorimain,

as reported by Faduma Wais, Morissa Dalhia-Ellis and Hadi Wess and uploaded the video to his personal Facebook account, where it remains.

Graham Robertson and The Fulcrum

Graham Robertson reported on, and The Fulcrum published on March 9, 2017, statements, under the heading: “Tensions rise between SFUO execs at March 5, BOA”, as follows:

SFUO vice-president of university affairs Vanessa Dorimain, who was unable to attend the meeting, submitted her executive updates via email, which was read by a proxy.

As part of her updates, Dorimain addressed Ahimakin’s behaviour over the course of the 2016–17 academic year, writing that he is “violent and misogynistic” and “shuts down women in conversations.” The reading continued, with Dorimain claiming that Ahimakin has yelled at her on a number of occasions and has also missed multiple meetings....

Dorimain concluded her email by telling the board that, having worked alongside Ahimakin for two years, she once considered him a friend but now fears him... According to Wess, Ahimakin has made executive meetings an “unsafe space” for many current members, and he has missed many meetings and events.

The plaintiff asserts that the above-referenced statements are neither fair nor accurate.

Date: March 22, 2017

Romeo Ahimakin
by his counsel

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AND TO:
Graham Robertson and The Fulcrum
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Ottawa, Ontario
Attention: Savannah Awde
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AHIMAKIN

Plaintiff(s)/Applicant(s)

and

DORIMAIN ET AL.

Defendant(s)/Respondent(s)

Court File No.

ONTARIO

**SUPERIOR COURT OF
JUSTICE**

Proceedings commenced at
OTTAWA

NOTICE OF ACTION

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BOX 352