This is Exhibit "D" to the Affidavit
of Michael Stephens
Sworn before me this 8th day
of September 20 11

A Commissioner, etc.

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August 3, 2011

David Flook
276 Merritt Avenue
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Dear Sir:

RE: Chatham-Kent Children's Services and Andrea Wathy v. David Flook
Our File No. 51963

Please find enclosed a Notice with regard to the above-noted matter which is being served upon you pursuant to the *Libel and Slander Act*, RSO 1990, c L-12.

Yours very truly,

McTAGUE LAW FIRM LLP

per:

GEORGE W. KING

GWK:da
Enclosure

SUPERIOR COURT OF JUSTICE

IN THE MATTER OF an intended action

BETWEEN

CHATHAM-KENT CHILDREN'S SERVICES and ANDREA WATHY

Plaintiffs

-and-

DAVID FLOOK

Defendant

NOTICE

Pursuant to s. 5(1) of the *Libel and Slander Act*, R.S.O. 1990, c. L.12, Chatham-Kent Children's Services ("CKCS") and Andrea Wathy, hereby complain of internet broadcasts on http://www.notalldadsaredeadbeats.com ("NADAD") on:

Tuesday, July 4, 2011;

Tuesday July 5, 2011;

Thursday July 7, 2011;

Monday, July 11, 2011;

Thursday, July 14, 2011; and

Thursday, July 28, 2011.

and on http://www.facebook.com/NADADS?sk=wall ("Facebook") on:

Tuesday, July 4, 2011;

Friday, July 8, 2011; and

Tuesday, July 26, 2011.

which first came to the knowledge of CKCS and Andrea Wathy on July 5, 2011 and from time to time thereafter. These broadcasts contained statements that are defamatory and calculated to disparage the character and reputation of CKCS and Andrea Wathy. Without limiting the generality of the defamatory meaning ascribed to the broadcast, the matters complained of are as follows:

1. The July 4, 2011 internet video posted on NADAD (and linked to on Facebook) entitled, "Part 1 – advice on how to protect yourself from CAS workers" in which the Defendant states, "Workers for CAS...defy laws and break laws in order to dig dirt on you and get what they want." The Defendant directly relates these comments to an upcoming meeting he is scheduled to have with Andrea Wathy in her capacity as an employee of CKCS.

2. The July 4, 2001 internet video posted on NADAD (and linked to on Facebook) entitled, "Part 1 – advice on how to protect yourself from CAS workers" in which the Defendant states that, "[Andrea Wathy] is going to be breaking the law." This comment is in direct reference to the Plaintiff in her employment capacity.

3. The July 4, 2011 posting on Facebook (and cross-posted on NADAD on July 5, 2011), which refers to CKCS as a "corrupt organization".

4. The July 4, 2011 posting on Facebook (and cross-posted on NADAD on July 5, 2011), which states that CKCS "obviously encourages you [Andrea Wathy] to break the laws".

5. The July 4, 2011 posting on Facebook (and cross-posted on NADAD on July 5, 2011), which states that CKCS uses "often blunt (and illegal) tactics".

6. The July 7, 2011 internet posting on NADAD, which states that CKCS "is a corrupt organization".

7. The July 8, 2011 internet posting on Facebook where the Defendant states, "...Andrea/CAS has conducted themselves in an illegal manner and how the whole organization is wrought with corruption."

8. The July 11, 2011 internet posting on NADAD, which states that "CAS workers in the province of Ontario are breaking the law and are fully aware of what they are doing to mislead the public."

9. The July 14, 2011 internet posting on NADAD, which states that "...the CAS corporation often conducts itself in unlawful manners and is at it's core is a corrupt corporation."

10. The July 26, 2011 audio recording linked to on Facebook as http://notalldadsaredeadbeats.com/audio/CAS.mp3 (and cross-posted on NADAD as of July 28, 2011), which:
    a. compares the CAS and its employees to terrorists and Hitler;
    b. refers to CAS employees as "pricks";
    c. states that CAS and its employees "kidnap" children; and
    d. states that the CAS is "bullshit".

August 3, 2011

CHATHAM-KENT CHILDREN'S SERVICES
and ANDREA WATHY by their lawyer

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