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March 31, 2019

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## **WITH PREJUDICE**

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Mr. Andrew Scheer  
Office of the Honourable Andrew Scheer, M.P.  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Mr. Scheer:

I represent Prime Minister Justin Trudeau.

On March 29, 2019 you issued a press statement titled “Andrew Scheer Issues Statement on Jody Wilson-Raybould Documents”. You published that statement online, including on your Twitter account and Facebook page, in both English and French. As you would have expected, your statement was in turn republished in whole or in part by members of the Conservative Party caucus, including by both Erin O’Toole and Peter Kent.

Your statement was also published throughout Canada by a vast variety of media outlets (of which you are aware) in both English and French. The statement contained highly defamatory comments about Prime Minister Trudeau.

The Prime Minister supports wide-ranging and vigorous political debate on matters of public policy. However, your statement, in its entirety, is beyond the pale of fair debate and is libellous of my client personally and in the way of his occupation as Prime Minister. In particular:

1. As regards paragraph 2 of your statement:

“These documents and recordings are concrete evidence that proves Justin Trudeau led a campaign to politically interfere with SNC-Lavalin’s criminal prosecution.”

This was meant and understood to mean that my client politically interfered with SNC-Lavalin’s criminal prosecution. That is entirely false. There is no evidence that suggests that there has been any actual interference with SNC-Lavalin’s criminal prosecution.

“He personally gave the orders and when the former Attorney General refused to follow them and break the law, she was fired.”

This was meant and understood to mean that my client personally subverted the judicial process to interfere with a criminal prosecution and by instructing the former Attorney General to break the law. When she refused, he acted with malice and an improper purpose in changing Ms. Wilson-Raybould’s portfolio. That is entirely false.

2. As regards paragraph 3 of your statement:

“Ms. Wilson-Raybould repeatedly told the Prime Minister and his top officials that their actions were ‘entirely inappropriate’ and amounted to ‘political interference’. Despite her objections, the Clerk of the Privy Council pressured her and made it clear that her job was on the line.”

This was meant and understood to mean that the Prime Minister had been informed by Ms. Wilson-Raybould that his actions were ‘entirely inappropriate’ and amounted to ‘political interference’ and he falsely pretended to be unaware of her position. That is entirely false.

3. As regards paragraph 4 of your statement:

“Justin Trudeau also told Canadians what he knew to be false. He knew that his Attorney General had serious concerns about his plan to get SNC-Lavalin off of serious criminal charges. But he looked Canadians in the eye and told them that no one had raised concerns with him. This is false and he owes Canadians an explanation.”

This was meant and understood to mean that Prime Minister Trudeau lied to the public when he told the public that no one had raised concerns when he knew as a fact that Ms. Wilson-Raybould had raised concerns with him. That is entirely false, as confirmed by Mr. Wernick’s recent statement.

4. As regards paragraph 5 of your statement:

“The entire SNC-Lavalin scandal is corruption on top of corruption on top of corruption. Two cabinet ministers have resigned on principle and both Justin Trudeau’s top political advisor and his top civil servant have resigned in disgrace. The Prime Minister has lost the moral authority to govern and must resign.”

This was meant and understood to mean that Justin Trudeau had engaged in dishonest and corrupt conduct that would contravene the *Criminal Code of Canada*. It was also meant and understood to mean the Prime Minister engaged in fraudulent conduct in performing public acts for his own purpose which acts constituted an abuse of legitimate power. It was further meant and understood to mean that he was individually the creator of the worst political conduct possible, being corruption, which is deserving of a criminal penalty of up to 14 years’ incarceration. That is entirely false.

This letter will be referred to in any subsequent action and is to be treated as a notice pursuant to s. 5 of the *Libel and Slander Act* of Ontario.

Yours truly,

A handwritten signature in cursive script that reads "Julian Porter". The signature is written in black ink and is positioned above the printed name.

Julian Porter, Q.C.

JP:dm

c. Marc-André Leclerc