



**WALSH & COMPANY**  
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July 7, 2009

Downtown Winnipeg Biz  
Main Floor  
426 Portage Avenue  
Winnipeg, Manitoba  
R3C 0C9

delivered

**Attention: Mr. Stefano Grande, Executive Director**

Dear Mr. Grande;

**Re: Downtown Security Network**

Thank you for your letter of July 2, 2009.

I have now had the opportunity of considering its contents and in particular grappling with the issue articulated therein.

Succinctly stated: Is the DSN including its proprietor and membership exposed to legal liability by virtue of the publication of either pictures or other identifying information which relates to alleged suspects?

In formulating my opinion I have reviewed the law pertaining to defamation and the usual defences which are available.

Firstly, I note that the possible defamatory information is available to a very select but not small group but who clearly have an interest in both knowing about and disseminating information which pertains to alleged criminal activity in the City of Winnipeg.

Secondly, I note that the information is posted only when there is a legitimate belief in the accuracy of the information and that the circumstances of its acquisition are highly reliable.

Thirdly, I note that there is publication of the usual disclaimers and that the parties who have access to the website are very much aware of how the information was collected and why it may or may not be reliable.

Based on all of the above, there does not appear to be any possibility of anyone abusing the website or posting information in a malicious fashion.

It is therefore my view that errors will be kept to a very small minimum and that innocent persons will suffer only nominal damage.

I am assuming that any accusations will be very circumspect and the linking of individuals with misconduct will be clearly articulated to be allegations which are unproven.

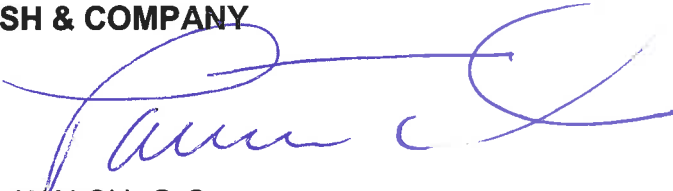
It is therefore my legal opinion that incidents of potential liability will be very few and far between and where there is potential liability there will be substantial defences and even where those defences might fail, any claim for damages will be nominal at best and minimal at worst.

I trust this opinion is what you require and if you request elaboration I will be glad to oblige.

Yours truly,

**WALSH & COMPANY**

Per:

A handwritten signature in blue ink, appearing to read 'Paul Walsh', written over a horizontal line.

PAUL WALSH, Q.C.  
PW/sv