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Refer to file no. 45136

April 21, 2023

**BY EMAIL AND BY REGULAR MAIL**

**Jennifer Bernard**

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To Whom It Shall Concern,

**RE: NOTICE OF LIBEL AND CEASE AND DESIST  
Caroline Riseboro |**

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We are legal counsel to Caroline Riseboro (“Ms. Riseboro”). Between 2018 to 2020, Ms. Riseboro served as President and Board Chair of the Association of Fundraising Professionals (AFP) for the Greater Toronto Chapter (“AFP-GTC”). In recognition of her excellent service to the profession and Association over 25 years, Ms. Riseboro was awarded the Outstanding Fundraising Professional’s Award in November 2022.

In November 2022, Nneka Allen and Mide Akerewusi, both former disgruntled Board Members and Ms. Allen’s associate, Elizabeth LeClair, began posting defamatory statements about Ms. Riseboro on social media. Ms. Allen and Ms. Akerewusi both served on the Board during Ms. Riseboro’s tenure as President and Board Chair. Elizabeth LeClair had no affiliation with AFP-GTC.

In February 2023, Ms. Allen published a lecture that she gave in November 2022 at the University of British Columbia-after she had been asked to resign from the Board because of her harrasing and combative behaviour. The lecture consisted of 22 pages detailing her alleged encounter with racism while involved with AFP-GTC. That publication was libellous in that it falsely stated or implied that Ms. Riseboro was racist.

The libel and slander to which Ms. Allen and her associates have subjected Ms. Riseboro arises solely as a result of Ms. Allen’s dissatisfaction with being confronted with her egregious behaviour as an AFP Board Member, her serious and continued violations of AFP’s *Code of Conduct*, and her harassing, intimidating, aggressive, confrontational, and combative toward other Board Members, including other black Board Members. As a result of her refusal or inability to conduct herself in a civil and professional manner which resulted in her complete inability to perform her duties, competently or effectively, Ms. Allen resigned from the Board on November 26, 2019 in advance of a vote to remove her. The motion to remove her was, in fact, going to be initiated by another black Board Member.

Elizabeth LeClair, a friend or associate of Ms. Allen, who has no connection with AFP GTC or Ms. Riseboro, posted an article on LinkedIn on February 21, 2023 referring to Ms. Allen's lecture, and specifically naming Ms. Riseboro in the post as the Board Chair referred to in Ms. Allen's lecture. Elizabeth LeClair has also "tweeted" posts on Twitter repeating the defamatory allegations. It was brought to Ms. Riseboro's attention that their demands were that AFP-GTC was to submit a formal apology or sponsors would be contacted to ask them to withdraw their financial support-an obvious threat of blackmail.

On April 12, 2023, the Board of AFP-GTC issued a written letter apologizing for the "systemic, anti-black racism" at AFP-GTC that allegedly took place during Ms. Riseboro's tenure as Board Chair. This letter was issued without consulting Ms. Riseboro or taking any steps to investigate the veracity of the outrageous allegations made by Ms. Allen and her "supporter." Even the most cursory investigation would have revealed that these two individuals have a history of engaging in social media campaigns in which they spread false and malicious allegations. Elizabeth LeClair has a history of targeting "high profile" fundraisers. Other individuals who also have had defamatory statements made about them by these two individuals have contacted Ms. Riseboro to describe how they were also targeted and attacked. Our client understands that several other victims targeted by LeClair have had to take legal action to prevent them from spreading their defamatory statements. This information could have been shared by Ms. Riseboro had AFP-GTC contacted Ms. Riseboro before releasing its defamatory "apology" in which it is falsely acknowledged that there was "systemic, anti-black racism" at AFP-GTC during Ms. Riseboro's tenure as President and Chair.

By accepting the defamatory allegations as being true and sending an "apology" letter without the barest investigation or consultation with Ms. Riseboro as to whether the allegations of "anti-black racism," have any basis in truth, AFP-GTC has repeated and spread the defamation, and wrongfully tarnished Ms. Riseboro's professional and personal reputation.

The allegations, implications, and innuendo that Ms. Riseboro has engaged in racist behaviour are clearly intended to and have caused harm to our client's professional and personal reputation. On behalf of Ms. Riseboro, we hereby demand that:

1. AFP Global, AFP Canada, and AFP-GTC refrain from publishing or posting any further defamatory statements stating, suggesting, or implying that Ms. Riseboro is racist or that there was "systemic, anti-black racism" at AFP-GTC during her tenure as President and Chair.
2. AFP-GTC withdraw the apology letter posted on April 12, 2023.
3. AFP Global, AFP Canada, and AFP-GTC produce to Ms. Riseboro any written communications between them and Ms. LeClair, Nneka Allen, and Mide Akerewusi in relation to their allegations of racism.

Ms. Riseboro hereby provides Association of Fundraising Professionals, Global, the Association of Fundraising Professionals-Canada, and the Association of Fundraising Professionals-Greater Toronto Chapter notice, pursuant to section 5(1) of the *Libel and Slander Act*, RSO 1990, c L12, of its intention to commence an action in libel seeking substantial damages.

As we are communicating with you directly, we have an obligation to urge AFP to seek legal advice with respect to the issues raised in this letter. It is our strong suggestion that you immediately do so and that you take legal advice from a lawyer regarding the issues raised in this letter. We look forward to hearing from AFP's lawyer at their earliest convenience.

Yours truly,

BIRENBAUM, STEINBERG, LANDAU, SAVIN & COLRAINE LLP

A handwritten signature in black ink, appearing to read "C. R. Colraine". The signature is written in a cursive style with a large, looping initial "C".

Craig R. Colraine  
CC/ms

cc: client