

Court File No. **SC-23-00007950-0000**

**ONTARIO**

**SUPERIOR COURT OF JUSTICE**

**TORONTO**

**B E T W E E N :**

**JEREMY MACKENZIE**

**Plaintiff**

**- and -**

**EZRA LEVANT,**

**REBEL MEDIA HOLDINGS INC.,**

**REBEL NEWS NETWORK LTD.**

**Defendant**

## **AFFIDAVIT OF JASON LAVIGNE**

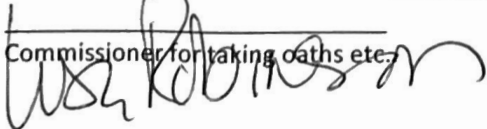
I, Jason Lavigne, of the Town of Breton, in the Province of Alberta, **MAKE OATH AND SAY** as follows:

- 1) I am the deponent of this affidavit. I have personal knowledge of the matters herein deposed, except where stated on information and belief, and where so stated, I verily believe them to be true.
- 2) As a journalist accredited by the Independent Press Gallery of Canada, I specialize in political and legal reporting.
- 3) On July 23, 2023, I was engaged in reporting on the Coutts Blockade incident from the Lethbridge courthouse.

- 4) On the aforementioned date, I attempted to interview Mr. Ezra Levant in the public hallway of the Lethbridge courthouse about his fundraising activities for the Coutts accused.
- 5) During this interview attempt, Mr. Levant became highly agitated and proceeded to loudly and publicly declare Mr. Jeremy MacKenzie, the plaintiff, as a "neo-nazi," further alleging that he was "a fed," while simultaneously denouncing supporters of the Coutts accused and attributing their legal troubles to an entity Mr. Levant referred to pejoratively as "Diagolon."
- 6) Within this accusation, the term "a fed" carries a deeply derogatory connotation, unequivocally suggesting that Mr. MacKenzie is covertly employed or manipulated by the Federal government. This allegation was intended to portray Mr. MacKenzie as a sinister government agent, thereby discrediting his integrity and loyalty and painting him as a betrayer working against the community's interests for malevolent purposes.
- 7) More than a dozen bystanders, including family members, friends, and supporters of the Coutts accused, witnessed this incident and appeared shocked and disturbed by Mr. Levant's unsolicited remarks.
- 8) Given their inflammatory and harmful nature, I perceived that Mr. Levant's comments were intended to damage Mr. MacKenzie's public and community reputation.
- 9) Later that day, I watched an episode of 'The Ezra Levant Show' broadcast on July 23, 2023, wherein Mr. Levant reiterated similar defamatory remarks, broadening the damage to Mr. MacKenzie's reputation to a national audience.
- 10) In the same broadcast, Mr. Levant derogatorily referred to me as a "wannabe MP," linking me to his earlier derogatory remarks about Mr. MacKenzie. Thus, the defamation was connected to and extended to public perceptions of Mr. MacKenzie's and my professional integrity.
- 11) At all relevant times, I was and am currently a registered Independent Candidate for the House of Commons of Canada for the Federal Riding of Yellowhead, Alberta.
- 12) Based on my observations and the context of Mr. Levant's statements, I believe they were made deliberately to harm Mr. MacKenzie's reputation for Mr. Levant's own perceived benefits.
- 13) I make this affidavit in support of Jeremy MacKenzie's claim for defamation and assert that the events and statements described herein are truthful and accurate to the best of my knowledge and belief.

Sworn remotely by Jason Lavigne stated as )  
being in the City of Lethbridge, in the County of )  
Lethbridge, of Alberta before me at )  
the City of Pickering, in the Region of Durham. )  
of Ontario, on April 15, 2024, )  
in accordance with O. Reg 431/20, )  
administering Oath or Declaration Remotely. )

Commissioner for taking oaths etc. )



JASON LAVIGNE

**LISA-LYNNE ROBINSON,**  
a Commissioner etc.,  
Province of Ontario,  
while a licensed Paralegal.  
LSO #P17153