



**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

SERGIO R. KARAS

Plaintiff

-and-

KAREEM ESSAM IBRAHIM

Defendant

STATEMENT OF CLAIM

TO THE DEFENDANT:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and \$5,000.00 for costs, within the time for serving and filing your statement of defence, you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and \$400.00 for costs and have the costs assessed by the court.

Date March ____, 2024

Issued by _____
330 University Avenue
Toronto, Ontario M5G 1R8

TO: **KAREEM ESSAM IBRAHIM**
2967 Dundas St W
Toronto, Ontario, M6P 1Z2

**THIS ACTION IS BROUGHT AGAINST YOU UNDER THE SIMPLIFIED
PROCEDURE PROVIDED IN RULE 76 OF THE RULES OF CIVIL PROCEDURE**

CLAIMThe Plaintiff, Sergio R. Karas (“**Mr. Karas**” or the “**Plaintiff**”), claims against the defendant, Kareem Essam Ibrahim (the “**Defendant**”), for the following:

- a) General and Special Damages in the amount of \$175,000;
- b) Aggravated and/or Punitive damages in the amount of \$25,000;
- c) A Declaration that the Defendant defamed the Plaintiff;
- d) An Order that the Defendant remove and/or destroy any copy of or reference to the Defamatory Publication (defined below) from any source, medium or place accessible to any third party;
- e) An Order permanently restraining the Defendant from disseminating, posting on the internet or publishing or broadcasting in any manner whatsoever, either directly or indirectly, the Defamatory Publication (defined below) or words of similar and like nature and meaning;
- f) Pre and post judgment interest pursuant to the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended;
- g) Costs of this action, including applicable taxes; and
- h) Such further and other relief as this Honourable Court deems just.

THE PARTIES

2. The Plaintiff, Mr. Karas, is an individual residing in Toronto, Ontario.

3. Mr. Karas is a Canadian lawyer and certified specialist in Canadian Citizenship and Immigration Law, has made significant contributions to the field. Born in Buenos Aires, Argentina, Mr. Karas has helped hundreds of people successfully establish themselves in Canada. His expertise extends to high-profile cases, representing both individuals and multinational corporations in achieving their immigration objectives and implementing successful relocation strategies.

4. Mr. Karas is an honours graduate in political science from York University. He obtained his law degree from Osgoode Hall Law School.

5. Mr. Karas' articles on Canadian immigration law and policy are published in national and international journals. He provides immigration insight and commentary to Canada's national press and is a regular guest on local, national, and international radio and television programs. He is also a regular panelist and moderator at international conferences. .

6. Mr. Karas is a member a member of the Law Society of Ontario, the Canadian Bar Association, the International Bar Association, and the American Immigration Lawyers Association. He has held leadership roles, including being the Past Chair of the Citizenship and Immigration Section of the Ontario Bar Association and the Immigration and Nationality Committee of the International Bar Association. He is current co-Chair of the Immigration and Naturalization Committee of the American Bar Association Section of International Law.

7. Mr. Karas is listed in "Who is Who in Corporate Immigration Law," "Who is Who Thought Leaders," and "Best Lawyers" as a leading immigration lawyer. Additionally, he has received the "Platinum Client Champion Award" from Martindale Hubbell for several consecutive years.

8. In summary, Mr. Karas is not only an accomplished immigration lawyer but also a respected figure in the international legal community, contributing significantly to the field of immigration law and policy.

9. Mr. Karas has local, national and international name-recognition and enjoys a reputation in the "online world" that drives much of his good work and practice.

10. Mr. Karas is also a proud Jew, and a child of a father that lived through, and survived, the horrors of the Holocaust. Like most Jews in Canada and around the world, he is a Zionist – he believes in and supports the State of Israel as the national home and refuge for the Jewish people and believes that the Jewish people have a right to sovereignty in their indigenous and historical homeland.

11. The Defendant, Kareem Essam Ibrahim (“**Ibrahim**”), is an individual residing in Ontario. Ibrahim is a Canadian citizen and an immigration and refugee lawyer licensed in the Province of Ontario. He is active online, having 3,885 followers on the LinkedIn social media platform.

CAUSES OF ACTION

The Defamatory Publication

12. On or about February 29, 2024, Mr. Karas was in Houston, Texas, where he co-chaired a panel at the ABA Houston Energy Conference.

13. Mr. Karas shared a group picture of himself with five other individuals. One of the individuals was his co-chair, and the other five depicted in the photograph were panelists who were prominent Houston attorneys, an in-house counsel for a Canadian public company, and a senior human resources manager for a major US energy corporation.

14. Mr. Karas shared the photo on LinkedIn with the following quotation:


“Thank you to my fabulous panel at the ABA Houston energy conference [...]”

Mr. Karas proceeded to list the names of his co-chair and panelists, with the hashtags #immigration #energy #aba

15. Mr. Karas shared the photo on LinkedIn with the quotation above.

16. The Defendant, the same day, then proceeded to egregiously defame Mr. Karas (and by implication, others), by maliciously and recklessly publishing the following:

“Do these lawyers also support genocide, like you, Sergio R. Karas?”




Sergio R. Karas • You


Barrister and Solicitor at Karas Immigration Law Professional Corporation

1d • 🌐

...







Thank you to my fabulous panel at the ABA Houston energy conference: Samantha Barlow Martinez, Veronica Foley, James Prapas, Karen Hamady, and Christopher Triantaphyllis, and my awesome co-chair Bea Ballerini for getting these great speakers. [#Immigration](#) [#energy](#) [#aba](#)





 Charles H. Kaplan and 5 others

1 comment


Reactions





 Like Comment Repost Send


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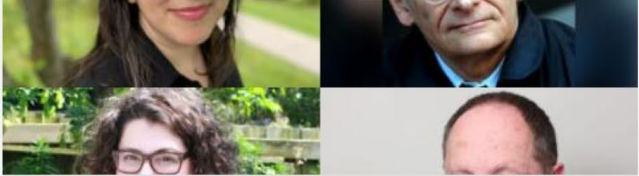
Kareem Ibrahim (They/Them) • 2nd

Refugee and Immigration Lawyer

16h • ••

Do these lawyers also support genocide, like you, [Sergio R. Karas](#)?

<https://www.canadianlawyermag.com/practice-areas/immigration/immigration-and-refugee-lawyers-raise-concerns-with-temporary-residence-program-for-gaza/383069>



Immigration and refugee lawyers raise concerns with temporary residenc...

canadianlawyermag.com

Like

Reply

(the “Defamatory Publication”)

17. The Defamatory Publication was publicly available. The Defamatory Publication was visible on Mr. Karas' LinkedIn profile for the entire world to see, including but not limited to his clients, colleagues, fellow members of the bar, committee members, friends and family.

18. The Defamatory Publication clearly refers to Mr. Karas, as the Defamatory Publication was on his profile, was written underneath a picture of Mr. Karas, and 'tagged' Mr. Karas.

The Defamatory Meaning

19. Mr. Karas pleads that the Defamatory Publication is defamatory and libelous. The Defamatory Publication, in its natural and ordinary meaning – literally, through implication and / or through innuendo – meant or was understood to mean the following:

- a) Mr. Karas supports genocide;
- b) Mr. Karas supports mass murder;
- c) Mr. Karas supports mass extermination;
- d) Mr. Karas supports criminality, terrorism and massacres;
- e) Mr. Karas is a hateful person, and
- f) Such further and other particulars and meanings that will be provided in the statement of claim and in advance of Trial.

Exponential and Unknown Republications, Views and "Screenshots"

20. Mr. Karas states, and the fact is, that the Defamatory Publication was published knowingly, maliciously and with the intention that it would be available to the public at-large.

21. Mr. Karas states, and the fact is, that the Defamatory Publication was viewed, republished, commented upon and responded to unknown times.

22. Mr. Karas pleads that the Defendant is liable for any and all republications, as the said republications were the natural and probable result of the Defamatory Publication. The Defamatory Publication was posted on social media, which included provocative ‘click-bait’ including egregious allegations that Mr. Karas supports genocide, one of the worst crimes known to humankind.

Reputational Damage

23. Mr. Karas pleads that as a result of the Defamatory Publication, he has suffered and will suffer damage to his personal and professional reputation and relationships (business, familial, friendship, supporters and followers). Mr. Karas has also suffered a loss of competitive advantage in the workplace as a result of the Defamatory Publication.

24. Mr. Karas pleads that the Defendant has acted with malice, which further aggravated the damages caused to Mr. Karas by:

- a) Publishing the Defamatory Publication with knowledge that it was false, or with reckless disregard for the truth;
- b) Publishing the Defamatory Publication without one shred of evidence or proof substantiating the allegation that Mr. Karas supports genocide;
- c) Publishing the Defamatory Publication on the internet, giving it absolute and immediate worldwide ubiquity and accessibility, and making it accessible to an indeterminate number of third parties;
- d) Failing to retract or apologize despite being requested to do so by Mr. Karas prior to commencement of litigation; and
- e) Targeting Mr. Karas because of his Jewish and Zionist background and / or beliefs;
- f) Doubling-down by continuing to engage Mr. Karas in a harassing manner, after having received the Notice of Libel, and in direct violation of the *Rules of Professional Conduct*; and

- g) such further and other particulars of malice that will be discovered and/or provided in advance of Trial.

25. The Defamatory Publication was harmful to Mr. Karas because the effects of false accusations about genocide and terrorism are less readily overcome than other defamatory statements.

DAMAGES

26. As a consequence of the aforesaid conduct of the Defendant, Mr. Karas pleads he is entitled to non-pecuniary general damages for pain and suffering, non-pecuniary general damages “at-large”, special damages, aggravated and/or punitive damages for the Defendant’s malicious, high-handed, arrogant and egregious conduct.

Reliance on Statutes and Regulations

27. Mr. Karas pleads and relies on the following statutes and regulations:

- a) *Libel and Slander Act*, R.S.O. 1990, c. L. 12
- b) *Human Rights Code*, R.S.O. 1990, c H. 19
- c) *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194
- d) *Courts of Justice Act*, R.S.O. 1990, c. C.43

March 13, 2024

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Lawyers for the Plaintiff

KARAS

IBRAHIM

-and-

Plaintiff

Defendant

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
TORONTO

STATEMENT OF CLAIM

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Lawyers for the Plaintiff