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was a child in need of protection" and that Brown "was a danger to her health and safety."

Justin Linden, the family's lawyer, said that there was more than sufficient evidence to warrant the agency's intervention.

"There's a substantial claim against them for damages and we will ask the court to find that the death of this young girl was preventable," he said, noting that the lawsuit is also to protect the next Keira and prevent something similar from happening in the future.

As for the claim against Conservation Halton, he

said that it was on the basis that there is an "unguarded, unprotected, unsafe drop off" at the park.

According to the claim, the conservation authority failed to post adequate warning signs or install barriers or any other safety equipment to prevent people from falling over the cliff.

None of the allegations in the lawsuit have been proven in court.

The Jewish Family and Child Service has not responded to a request for comment from Inside Halton. In an email to CBC News, the agency said it could not comment on the allegations.

Meanwhile, Conserva-

tion Halton said in an email that it could not comment because it has not yet seen the statement of claim.

"Once we have had a chance to review the statement of claim, we will be in a position to respond," said Plezzie Ramirez, human resources director with Conservation Halton.

The lawsuit is seeking "general damages in the amount of (\$1 million) for the wrongful death of Keira (Kagan)," according to the claim, as well as special damages in the amount of \$10 million, and "aggravated, punitive, and exemplary damages" in the amount of \$5 million, among other costs.

- with files from Torstar

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