

In The Supreme Court of British Columbia

BETWEEN:

Action4Canada, Kimberly **Woolman**, The Estate of Jaqueline **Woolman**, Linda **Morken**, Gary **Morken**, Jane **Doe #1**, Brian **Edgar**, Amy **Muranetz**, Jane **Doe #2**, Ilona **Zink**, Federico **Fuoco**, **Fire Productions Limited**, **F2 Productions Incorporated**, Valerie Ann **Foley**, Pastor Randy **Beatty**, Michael **Martinz**, Makhan S. **Parhar**, North **Delta Real Hot Yoga Limited**, Melissa Anne **Neubauer**, Jane **Doe #3**

PLAINTIFFS

AND:

Her Majesty the Queen in right British Columbia, Prime Minister **Justin Trudeau**, Chief Public Health Officer **Theresa Tam**, Dr. Bonnie **Henry**, Premier John **Horgan**, Adrian **Dix**, Minister of Health, Jennifer **Whiteside**, Minister of Education, Mable **Elmore**, Parliamentary Secretary for Seniors' Services and Long-Term Care, Mike **Farnworth**, Minister of Public Safety and Solicitor General **British Columbia Ferry Services Inc.** (operating as British Columbia Ferries), Omar **Alghabra**, Minister of Transport, **Vancouver Island Health Authority**, **The Royal Canadian Mounted Police** (RCMP), and the **Attorney General of Canada**, Brittney **Sylvester**, Peter **Kwok**, **Providence Health Care**, **Canadian Broadcasting Corporation**, **TransLink (British Columbia)**

DEFENDANTS

NOTICE OF CIVIL CLAIM

High Level Summary:

1. 20 Plaintiffs seek damages in amounts ranging from \$200,000 to \$2m for various breaches of pre-Constitutional rights in the pre-able to the Constitution and Charter rights violations not justified by section 1 of the Charter and the *Oakes* test established by the Supreme Court of Canada. [The *Oakes* test states that any restriction of Charter right must (i) have a valid objective, (ii) be rational, (iii) be tailored to minimally infringe the Charter right and (iv) the benefit must outweigh the negative effects. The onus is on the government to show the rights violations were justified under section 1 of the Charter and the *Oakes* test].
 - a. The Plaintiffs include adult children of a parent in a care home, citizens with medical exemptions for masks buying groceries, using BC ferries and Translink, small business owners impacted by Covid Measures, a Pastor holding worship, a passenger arriving at YVR airport, a teacher, cancer survivor and nurse.
2. 19 Defendants include the Province of BC, Premier Horgan, Dr. Henry, Justin Trudeau and various others.

3. In short, the Plaintiffs say that the Covid Measures:
 - a. caused more harm than the purported benefit
 - b. were implemented with no risk assessment of the social, economic and psychological impacts that cause more harm than Covid itself, particularly to elderly, disabled and children
 - c. social distancing, masking, isolation, etc have not been scientifically proven
 - d. ignore and censor contrary expert scientific and medical evidence (including the concept of natural herd immunity, lack of need for children or other low risk individuals to vaccinate, eating healthy and physical exercise, etc.)
 - e. were implemented without disclosing the scientific, medical or other evidence-based rational
 - f. based on inflated case counts from tests that resulted in a high rate of false positives
 - g. more adversely impact small businesses and favor large corporations and businesses that were permitted to stay open as “essential”, more adversely effect blue collar workers who cannot work from home and less adversely impact white collar.
 - h. Failed to take into account or do any risk assessment of negative consequences
 - i. were not lawfully enacted (various statutory and constitutional limitations on power to make orders was not respected at both the federal and provincial level, orders/decrees/verbal statements are void/*ultra virus*)
4. The Plaintiffs say the data for the vaccines is incomplete or non-existent such that it is impossible to obtain informed consent (due to insufficient information) and administering the vaccines mounts to experimental medical treatment. That an “emergency” does not warrant improper, negligent, untested vaccines. That the vaccine manufacturers have been given legal immunity for any harm or injury caused from the vaccines and this removes their incentive to make the safest vaccine and results in poorly tested products.
5. Mandatory vaccinations violate the basic right of an individual to weigh the risks and benefits of medical treatment and decide on an individual basis to consent. Forcing the Plaintiffs to “choose to” vaccinate or be denied the ability to engage in ‘non-essential’ activities is a constitutional violation of various rights and freedoms to participate in society.
6. The push for mandatory vaccinations at the provincial and federal level is based on dogma of the World Health Organization (WHO). The WHO, the Plaintiffs say, has not provided the scientific or medical basis for its position that there is a pandemic and vaccination is required in order to return to normal. Further, the Plaintiffs say:
 - a. The WHO is funded significantly by Bill Gates (through an organization and foundation)
 - b. Bill Gates has invested billions of dollars in vaccine research and development, chip and surveillance technology

- c. Gates, vaccine manufacturers and IT corporations obtain a financial advantage resulting from vaccination of the entire population, the need for apps and other technology to monitor vaccination and reliance on technology to participate in the world virtually.
 - d. Securing the financial advantage requires that the population will cooperate in getting vaccinated.
 - e. Fear of a Covid pandemic is being used to get the population to adhere (meaning vaccinate), download apps to monitor vaccination (agree to surveillance), adjust to the “new normal” of a more virtual world, accept an erosion of basic and fundamental rights and accept a government making orders/directions/laws outside the usual constitutional processes and Rule of Law.
 - f. Political, economic and social leaders, including Dr. Henry, are connected to the WHO
7. Trudeau, Horgan, Henry and others have made reckless and inaccurate statements to the public and failed to follow the protocols they directed the public to adhere to
 8. CBC, a publically funded broadcaster, and other mainstream media is purposely suppressing valid, sound criticism from recognized experts.
 9. The Plaintiffs stress that for declaration of an “emergency” or pandemic the most relevant question is the total number of *excess deaths*, that comparing the pandemic to the annual seasonal influenza virus shows there is no emergency. The mathematic model from the WHO to measure the alleged threat was never proven.
 10. In addition to monetary damages, the Plaintiffs seek various declarations including that there were constitutional violations, various provincial and federal orders are void, Charter violations were unjustified and a declaration that there is no “emergency”. They are also asking that the Defendant release the data, scientific evidence and medical evidence they relied on to justify the Covid Measures.